

1. KEYWORDS

ENVIRONMENTAL COMPLIANCE ASSESSMENT REPORT
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ECAS / TRADOC INSTALLATIONS / WATER QUALITY MANAGEMENT
SOLID WASTE / RADON / ASBESTOS
LEAD-BASED PAINT / WASTEWATER

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FORT BLISS, TEXAS

8. AUTHORS
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9. ARLOC/ACTIVITY 48083 000

10. PROJECT CONTROL NUMBER 32-EE-7170-97

ECAS

(Environmental Compliance Assessment System)

ENVIRONMENTAL COMPLIANCE ASSESSMENT REPORT
FORT BLISS, TEXAS
1 - 16 DECEMBER 1997

#32-EE-7170-97



Prepared by:

U.S. Army Center for Health Promotion and Preventive Medicine

Aberdeen Proving Ground, MD 21010-5422

Distribution limited to U.S. Government agencies only; protection of privileged information evaluating another command; February 1998. Requests for this document must be referred to Commander, U.S. Army Training and Doctrine Command, ATTN: ATBO-SE, Fort Monroe, VA 23651-5451.



REPLY TO
ATTENTION OF

DEPARTMENT OF THE ARMY
U.S. ARMY CENTER FOR HEALTH PROMOTION AND PREVENTIVE MEDICINE
5158 BLACKHAWK ROAD
ABERDEEN PROVING GROUND, MARYLAND 21010-5422

MCHB-TS-ESW (40)

26 FEB 1998

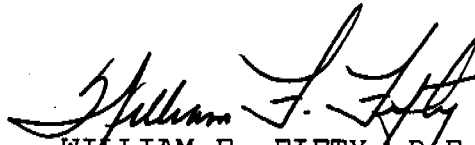
MEMORANDUM FOR Commander, U.S. Army Training and Doctrine
Command, ATTN: ATBO-SE, Fort Monroe, VA
23651-5451

SUBJECT: Environmental Compliance Assessment Report No. 32-EE-
7170-97, Fort Bliss, Texas, 1-16 December 1997

Two copies of the subject report are enclosed. The Executive Summary is provided as Chapter 1 of the report. The point of contact for this report is Mr. Richard Valcourt. He may be contacted at DSN 584-8131 or commercial (410) 671-8131. Additional comments or concerns may be directed to the undersigned at DSN 584-3816 or commercial (410) 671-3816.

FOR THE COMMANDER:

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Readiness thru Health

CHAPTER 1

EXECUTIVE SUMMARY

1.1 BACKGROUND

1.1.1 The Environmental Compliance Assessment System (ECAS) Program supports the Total Army (Active Army, Army Reserve, and Army National Guard). The U. S. Army Training and Doctrine Command (TRADOC) ECAS Program is executed to support the TRADOC Commanding General in achieving, maintaining, and monitoring full environmental compliance at the 17 TRADOC installations. Army Regulations (AR) 200-1 requires an external assessment of each installation every third year. The last external ECAS assessment at Fort Bliss was conducted in December 1994.

1.1.2 This Environmental Compliance Assessment Report (ECAR) provides the results of the assessment at Fort Bliss, Texas. Fort Bliss was the 2nd TRADOC installation to be assessed during the third cycle of TRADOC's ECAS Program (beginning in FY 98) by U.S. Army Center for Health Promotion and Preventive Medicine (USACHPPM). The USACHPPM assessed all 17 TRADOC installations during the second cycle of the ECAS Program (FY 95-97).

1.1.3 The objective of the ECAS at Fort Bliss was threefold: (1) to provide a "snapshot in time" evaluation of Fort Bliss's environmental compliance status; (2) to identify specific deficiencies as well as systemic weaknesses of Fort Bliss's environmental program; and (3) to provide realistic suggested corrective actions that would help Fort Bliss achieve, maintain, and monitor environmental compliance. To accomplish this objective, the ECAS assessment team employed sampling strategies to obtain a representative view of Fort Bliss's activities and tenants. This Environmental Compliance Assessment Report (ECAR) should be used to implement Fort Bliss's continued commitment to improving environmental programs and complying with environmental laws and regulations.

1.1.4 The assessment at Fort Bliss was performed by a matrixed team of Army personnel (military and civilian) from USACHPPM and TRADOC. The ECAS team performed the onsite assessment during 1-16 December 1997. The preliminary results of the onsite assessment were reviewed during the Draft Findings Review meeting, which was held on 15 December 1997. The assessment Team Leader, Fort Bliss Directorate of Environment (DOE) staff, and a

TRADOC Environmental Office representative attended this meeting. Also in attendance was a representative from the Staff Judge Advocate Office.

1.2 SUMMARY OF FINDINGS.

1.2.1 Overall, Fort Bliss had a comprehensive and effective environmental program, which encompassed all media covered by Federal and state regulations. There was a high level of awareness of environmental regulations and responsibilities that influenced installation operations. A total of 124 findings were identified during the assessment. Twelve of the findings were positive. Table 1-1 presents a total summary of these findings by media type, finding category, and finding class.

1.2.2 In order to improve upon the environmental program, focus is required on the following: eliminating the number of repeat ECAS findings; improving upon communications and coordination efforts between the Directorate of Environment and the Directorate of Public Works and Logistics; cleaning and reducing the number of unpermitted solid waste dump sites; and strengthening air quality policies to ensure total compliance with applicable regulatory requirements.

1.3 FOLLOW-UP ACTIVITIES

Fort Bliss and TRADOC must complete the Installation Corrective Action Plan (ICAP), a tracking system and funding strategy for the corrective actions contained in this ECAR. The purpose of the ICAP is to serve as a planning document for Fort Bliss and TRADOC to use in funding, executing, and tracking the selected corrective actions. The ICAP tabular format lists findings, corrective actions, schedules, and required resources for correcting the deficiencies. The ICAP is enclosed as a separate attachment.

**TABLE 1-1
SUMMARY OF TOTAL FINDINGS**

Installation: Fort Bliss

FFID: TX-213720101

Fiscal Year: 1998

	REGULATORY			MANAGEMENT			
Compliance Area	I	II	H/S	POS	ITP	H/S	TOTAL
Air Emissions Management	3	2	0	2	1	0	8
Cultural Resources Management	2	0	0	1	2	0	5
Hazardous Materials Management	0	0	7	0	0	0	7
Hazardous Waste Management	11	0	0	0	0	0	11
Natural Resources Management	0	0	0	1	3	0	4
Environmental Impacts	1	2	0	0	3	0	6
Environmental Noise	0	0	0	1	4	0	5
Installation Restoration Program	0	0	0	1	1	0	2
Pollution Prevention	0	0	0	0	2	0	2
Environmental Program Management	0	0	0	3	1	0	4
Pesticides Management	1	0	1	2	13	1	18
Petroleum, Oils, Lubricants Management	2	0	0	0	6	0	8
Solid Waste Management	8	0	0	1	5	0	14
Storage Tanks Management	4	1	0	0	2	0	7
Polychlorinated Biphenyls (PCBs)	0	0	0	0	0	0	0
Asbestos	0	0	0	0	2	0	2
Radon	0	0	0	0	0	0	0
Lead-Based Paint	0	0	0	0	1	0	1
Wastewater Management	10	1	0	0	1	0	12
Water Quality Management	5	1	0	0	2	0	8
TOTAL	47	7	8	12	49	1	124

TABLE 1-1
SUMMARY OF TOTAL FINDINGS (continued)

KEY TO COMPLIANCE AREAS:

I:	Deficiency with exiting regulation.
II:	Deficiency with future regulation.
III:	AR/DOD/Management Practice finding.
H/S	Health and Safety.
POS:	Positive finding.

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CHAPTER 2

BACKGROUND AND SCOPE

2.1 ENVIRONMENTAL COMPLIANCE ASSESSMENTS

2.1.1 Objectives. The ECAS Program evolved from the Department of the Army's recognition that Army installations needed assistance in complying with the vast array of environmental legislation. The objective of the ECAS Program is to assist installation commanders in achieving, maintaining, and monitoring compliance with Federal, State, local, Department of Defense (DOD), and Army environmental regulations. The ECAS process provides a framework for the installation to identify and track compliance deficiencies. As a result, an installation's overall environmental program can be developed or improved. Of great benefit to the installation is the fact that the ECAS process not only identifies deficiencies, but also provides suggested corrective actions and targets resources to implement solutions.

2.1.2 Roles and Responsibilities. The USAEC manages the Army ECAS program by developing the ECAS work plan and budget, overseeing ECAS software and protocol development, providing compliance tracking and trend analysis, and providing ECAS training. Army assessment teams, such as USACHPPM, perform the onsite external assessments and produce the ECARs. During the second cycle of ECAS assessments, which began in FY95, Major Commands (MACOMs) increased their role in the ECAS assessment and the ICAP process. The MACOM and the installation select the corrective actions, negotiate schedules, and co-sign the ICAP. During the third cycle of ECAS assessments, which began in FY98, MACOMs such as TRADOC, began focusing on the enhancement of the ECAS process via pollution prevention integration, improved root cause analysis, and cost reduction initiatives.

2.1.3 Installation Risk Profile. Beginning with the third cycle of ECAS assessments, TRADOC adopted a risk-based approach to their ECAS Program. This approach allows "high risk" installations to be assessed on a more frequent basis while "low risk" installations are evaluated on a less frequent basis. This installation risk profile is established by TRADOC based on the installation's previous ECAS assessment and history of enforcement actions.

2.1.4 Customized Assessment Teams. Consistent with TRADOC's risk-based approach for their ECAS Program, "high risk" and "low risk" protocol areas are also designated and the assessment team

customized accordingly. The "low risk" protocol areas are not evaluated during each external assessment. Establishment of "low risk" protocol areas is a collaborative effort between the MACOM, installation environmental staff, and ECAS assessment Team Leader.

2.2 FORT BLISS BACKGROUND INFORMATION

2.2.1 Geographic Location. Fort Bliss occupies approximately 1.2 million acres of land in Texas and New Mexico. Areas controlled by Fort Bliss include the Main Cantonment Area, Biggs Army Airfield (AAF), and Logan Heights in the El Paso vicinity, as well as outposts at the McGregor Missile Firing Range, Dona Ana Range, and the Oro Grande Range.

Fort Bliss Cantonment, Logan Heights, and Biggs AAF are located in El Paso County and within the city limits of El Paso, Texas. These facilities occupy approximately 120,000 acres of land. The McGregor Range encompasses approximately 693,000 acres of land located in Otero County, south-central New Mexico. The range stretches nearly 40 miles northward from the Texas-New Mexico border to the Sacramento Mountains and 25 miles eastward from the U.S. Highway 54 to the Otero Mesa and Hueco Mountains. The Dona Ana and Oro Grande Ranges, located in both Otero and Dona Ana counties, extend westward from U.S. Highway 54 to the Organ Mountains and encompass nearly 300,000 acres of land.

Although the fort was first established in 1848, the area was originally inhabited by Native American Indians and then Spanish explorers and settlers who traveled through the mountain pass located west of the present site of Fort Bliss in the early 1500's. Because of this long period of habitation, the installation contains many sites and structures of cultural and historical significance.

2.2.2 Mission. Fort Bliss is a TRADOC installation, which has the primary mission of supporting the U.S. Army Air Defense Artillery Center (USAADAC). The post mission is to prepare and train combat air defense artillery troops, combat leaders, commissioned, and noncommissioned officers (NCOs) of all ranks. The fort also maintains a high state of combat readiness for Forces Command (FORSCOM) units assigned to the USAADAC. In addition, the German Air Force Air Defense School, William Beaumont Army Medical Center and several other tenant activities are located at the fort.

2.3 THE ECAS ASSESSMENT PROCESS

2.3.1 Evaluation Protocol. The ECAS team used the following

protocols to develop findings during the assessment: the Environmental Assessment Management (TEAM) Guide, September 1997 version; the July 1997 New Mexico and the June 1997 Texas supplements to the TEAM Guide; and the September 1997 Army supplement to the TEAM Guide. The New Mexico and Texas supplements were written by U.S. Army Corp of Engineers (USACE) Construction Engineering Research Laboratory (CERL). Version 1.8 (September 1997 revision) of the ECAS software was used to build the findings database and generate the corrective action report contained in this ECAR.

2.3.2 ECAS Assessment Teams. The ECAS assessment at Fort Bliss was performed by a matrixed team of Army personnel (military and civilian) from the USACHPPM and the TRADOC Environmental Office. Table 2-1 contains a list of team members, their educational backgrounds, and their areas of responsibilities during the assessment.

2.3.3 Scoping Visit. The ECAS assessment Team Leader and the TRADOC ECAS Coordinator conducted a scoping visit at Fort Bliss, 6-10 October 1997. The Team Leader and TRADOC representative presented an entrance brief to the Fort Bliss Garrison Commander, Director of Environment and several command elements to define the scope of the onsite assessment. Desk-side or telephonic information briefings were provided to other directorates and major tenants. The Team Leader also made administrative and logistical arrangements, coordinated with selected activities, acquired background information, and determined the data management requirements. During the scoping visit, it was agreed that all of the TEAM Guide protocol areas except for one would be evaluated. The "low risk" protocol area omitted was radon.

2.3.4 Onsite Assessment. During the onsite assessment (1-14 December 1997) the assessment teams visited and inspected various activities and facilities, reviewed records, and interviewed personnel to determine compliance status and program weaknesses. The team members also provided onsite assistance, generally verbal and written technical guidance, to Fort Bliss personnel as requested. The team developed findings and entered them into databases using the ECAS software. The ECAS Team Leader provided quality control on all findings and updated the DOE staff daily on the team's preliminary findings. The daily reviews allowed continual interaction between the DOE staff, assessed organizations and the ECAS teams, and continual improvement in individual findings. Each afternoon the team met to discuss findings, exchange information, identify any problems encountered, and finalize the schedules for the following day. Before leaving Fort

TABLE 2-1 FORT BLISS ECAS TEAM

Richard Valcourt	B.S. Civil Engineering	Team Leader
Towanda Cooper	B.S. Business Administration	Administrative Assistant
Stafford Coakley	B.S. Civil Engineering	Air Emissions Management
Christopher McDaid	B.A. Anthropology & History M.A. Colonial American History	Cultural Resources Management
Jennifer Houser	B.S. Environmental Health Science	Hazardous Materials Management; Toxics: Asbestos, Radon, Lead-based Paint
Murray Brown	B.S. Chemistry M.S. Chemistry	Hazardous Waste Management; Toxics: PCBs; Pollution Prevention
Kenneth Mioduski	B.A. Environmental Engineering M.A. Environmental Engineering	Hazardous Waste Management; PCBs; Toxics; Pollution Prevention
2LT Dereck Irminger	B.S. Mechanical Engineering	Hazardous Waste Management; PCBs; Toxics; Pollution Prevention
Peter Anderson	B.S. Biology M.S. Biology	Pollution Prevention
Thomas Stierhoff	B.S. Biology & Natural Resources M.S. Biology & Natural Resources	Natural Resources Management; National Environmental Policy Act
David Bensch	Environmental Engineering Studies	Environmental Noise
Kathleen Butoryak	B.S. Geology M.S. Geology	Installation Restoration Program; Solid Waste Management; Storage Tank Management
Jefferson Ghent	B.S. Geology	Installation Restoration Program; Solid Waste Management;
Susan Newkirk	B.S. Biology	Environmental Program Management
Malcolm Boswell	B.S. Botany	Pesticide Management
1LT Brian Nell	B.S. Chemical Engineering	Storage Tank Management
Kent Prinn	B.S. Chemical Engineering M.S. Engineering Management	POL Management; Wastewater Management
Richard Valdivia	B.S. Biological Oceanography	Water Quality Management

Bliss, each team member briefed their perspective DOE point of contact on specific findings.

2.3.5 Draft Findings Review. A Draft Report was produced at the end of the onsite assessment. On 15 December, a meeting was held to review the draft ECAS findings and suggested corrective actions. Attendees included the ECAS Team Leader, TRADOC representative, representatives from the DOE and a SJA representative. The draft report, including any substantial changes made during the Draft Findings Review, was provided to Fort Bliss, the TRADOC Environmental Office, and USAEC for review and comment.

2.3.6 Exit Briefing. On 16 December, the Team Leader provided an exit briefing to the Fort Bliss Commanding General, Garrison Commander and members of the Environmental Quality Control Committee (EQCC). Representatives from TRADOC, DOE, SJA, and other major organizations also attended the briefing. The ECAS Team Leader presented a summary of the findings and discussed problem areas found during the ECAS assessment.

2.3.7 Environmental Compliance Assessment Report. The Fort Bliss DOE, TRADOC Environmental Office, and USAEC reviewed the draft report and provided comments during a 4-week period after the assessment. These comments were reviewed by the ECAS team members and incorporated into the final ECAS database. The ECAR was produced and distributed 4 weeks after the comments were received, 8 weeks after the onsite assessment.

2.3.8 Installation Corrective Action Plan. The ICAP is a planning document that is used as a funding identifier and tracking system for the selected corrective actions specified in the ECAR. The draft ICAP is provided on disk so it can be modified and developed as necessary. The ICAP can be incorporated into a database management software such as Dbase III or IV, Foxpro, QuattroPro, Paradox, etc. The ECAS software is also capable of transferring the findings database into a generic data files that can be used by Fort Bliss. Fort Bliss may be requested periodically by TRADOC to submit a report on the status of the ICAP.

2.4 SAMPLING STRATEGY AND SITE EVALUATED

2.4.1 Sampling Plan Strategy. The ECAS teams used the following

strategy to select activities for observation:

- a. Sites with environmentally significant operations (e.g., vehicle maintenance, hazardous waste generation, boiler plants);
- b. Sites with compliance issues identified by Federal and state regulators;
- c. Activities requested by Fort Bliss or TRADOC for assessment emphasis;
- d. Findings from the 1994 ECAS and previous environmental reviews; and
- e. Random selections (e.g., dumpsters, storage tanks, stormwater outfalls, oil/water separators).

Written documentation which was consulted during sampling plan development included organizational charts, Public Works building user lists, lists of hazardous waste generators, storage tank inventories, and the Spill Prevention, Control, and Countermeasures Plans (SPCCP).

For several media, nearly 100 percent coverage was attainable. The Pesticide Management, Storage Tanks and Water Quality Management media areas are examples of this. For the larger media areas, almost 100 percent of the major environmentally significant activities were visited (e.g., landfills, treatment plants). A sample of the other environmentally significant activities (e.g., motor pools, hazardous material/waste accumulation areas) was selected to represent all similar activities at the posts.

2.4.2 Specific Sites Evaluated. Appendix B lists the actual activities and buildings evaluated by the ECAS team during the assessment, the media areas covered, and the finding numbers.

2.5 REFERENCES USED FOR COST ESTIMATES

Lab Safety Supply, General Safety Catalog, September 1994.

Pig Catalog, New Pig Corporation, 1994.

Estimating Costs of Air Pollution Control Systems, Vataavuk, William M., and Robert Neveril, Chemical Engineering, October 1980.

Cost Estimating for Major Process Equipment, Arkadie Pikulik and Hector E. Diaz, Chemical Engineering, October 10, 1977.

OAQPS Control Cost Manual, U.S. Environmental Protection Agency, Office of Air Quality Planning and Standards, Research Triangle Park, North Carolina, EPA 450/3-90-006.

Control Techniques for Volatile Organic Compound Emissions from Stationary Sources, U.S. Environmental Protection Agency, Office of Air Quality Planning and Standards, Research Triangle Park, North Carolina, EPA 453/R-92-018.

Means Facilities Construction Cost Data 1994, 9th Annual Edition, R.S. Means Company, Inc., Kingston, MA.

Means Heavy Construction Cost Data 1995, 9th Annual Edition, R.S. Means Company, Inc., Kingston, MA.

The Cost Digest: Cost Summaries of Selected Environmental Control Technologies, EPA 600/8-84-010, U.S. Environmental Protection Agency, October 1984.

Environmental Health and Safety Monitoring, 1995/1996 Catalog, Mitchell Instrument Co., San Marcos, CA.

CHAPTER 3

ECAS FINDINGS AND CORRECTIVE ACTIONS

This chapter contains the findings developed by the assessment team during the on-site assessment. The corrective actions listed are those agreed to during the comment period that followed the on-site assessment and Draft Findings Review. The findings are listed in order by TEAM Guide section number (or medium).

Findings are listed according to Class (or Category) in the following printouts. The definitions of Classes are:

Class I: Findings of immediate noncompliance with an environmental regulation, compliance agreement, consent order, or an existing notice of violation (NOV).

Class II: Findings of future noncompliance with an environmental regulation, compliance agreement, consent order, or an existing NOV.

Class III: Findings for which there are no specific Federal, state, or local regulatory requirements. These findings will include deviations from Army Regulations, DOD Directives, or other good management practices.

Health/Safety: Findings related to the Occupational Safety and Health Act and National Fire Protection Act requirements, as well as Department of Transportation regulations. Health and Safety findings are not classified as Class I, II, or III and are not eligible for environmental funding under the 1383 process.

Positive: Findings identified for situations where installations have exceeded the regulatory requirements or have implemented programs or actions that exemplify good management practices.

AIR EMISSIONS MANAGEMENT

The Air Emissions Management Program at Fort Bliss is a major focus area for the Directorate of Environment (DOE) and has achieved tremendous improvement attaining and maintaining compliance since the last assessment. This improvement can be attributed to the air program managers proactive approach to attaining full compliance with all applicable regulations and by emphasizing the importance of complete open communication with installation personnel, contractors, tenant activities, and regulatory agencies. This emphasis has allowed the program to have success in implementing stringent requirements mandated by the State Attorney General's legal action on Fort Bliss even before it became final.

Fort Bliss has been ordered by the States Attorney General to resolve past and present notices of violation (NOVs) in a Final Agreement that has not been officially signed and approved. Technically, the NOVs are unresolved until the agreement is signed.

Future non-compliance issues were identified in the areas of the Clean Air Act, Risk Management Plan (RMP) development which is due by June 1999. Developing Risk Management Programs require a lot of time and effort, therefore the USACHPPM recommend that installations procrastinate in complying with the RMP Rule.

Findings identified a few DPWL emission sources operating with faulty emission control equipment. Federally enforceable requirements that apply to several sources at Fort Bliss were also identified as present non-compliance issues.

Fort Bliss is preparing to develop a Title V permit application and all compliance issues will be addressed in the permit and a compliance plan/schedule will be implemented to attain total compliance with applicable regulatory requirements.

A.0.500.4T #1 I STATE CORRECTIVE ACTION Air Emissions

FINDING ID: A-SC-04

MANUAL QUESTION NUMBER: A-000-500-4T

FINDING CATEGORY: CLASS I

FINDING TYPE: Negative

EXISTING NOV: NO

LOCATION: DPWL HEAT SHOP

IFS FACILITY NUMBER: 01159

FACILITY TYPE: UTILITIES & GROUND IMPROVEMENTS

FINDING DESCRIPTION: The automatic paper and plastic shredder at

Building 1159 is fitted with a particulate control cyclone that is poorly designed allowing fugitive emissions to be emitted from the collection system. Because the control system failure consistently occurs, the Directorate of Environment (DOE) recommended that the facility be shut down until modifications can be done.

CRITERIA: Emission capture and abatement equipment must be maintained in good working order and operated according to Texas requirements (30 TAC, Section 101.7(a)).

FINDING COMMENTS: There was excessive amount of debris around the facility indicating a problem with fugitive emissions. The Directorate of Public Works and Logistics (DPWL) personnel have plans to use the shredder in its present state.

STATUS OF CORRECTION: INITIATED/WORK REQUEST SUBMITTED

CORRECTIVE ACTION: Replace the current collection system.
Estimated cost \$20k.

CORRECTIVE ACTION TYPE: EQUIPMENT PROCUREMENT OR CHANGE

COST: 20000

1383 PROJECT NUMBER:

CORRECTIVE ACTION COMMENTS: INSTALLATION COMMENT: DPWL is contracting with users of the machine (DPTMS) to replace the shredder. Funding is the issue.

A.1.1 #1 I FEDERAL CORRECTIVE ACTION

Air Emissions

FINDING ID: A-SC-01

MANUAL QUESTION NUMBER: A-001-001

FINDING CATEGORY: CLASS I

FINDING TYPE: Negative

EXISTING NOV: NO

LOCATION: INST

IFS FACILITY NUMBER: 00515

FACILITY TYPE: ADMINISTRATIVE, COMMUNICATION FACILITIES

FINDING DESCRIPTION: Fort Bliss has received numerous Notices of

Violations (NOVs) dating back to the early 1980's from the El Paso

City-County Health and Environmental District (EPCCHED) and from the Texas Natural Resource Conservation Commission (TNRCC).

Fort Bliss has negotiated an Agreed Final Agreement with the TNRCC and EPCCHED in the settlement of alleged air quality violations. The final judgement is a legal binding agreement administered through the Office of the Attorney General, State of Texas and imposes specific monitoring, recordkeeping, and reporting requirements for asbestos, fugitive dust, fuel storage, and fuel dispensing management. This agreement is in final draft, but has not received all the necessary signatures/concurrences from all responsible parties.

CRITERIA: The current status of any ongoing or unresolved consent

orders, compliance agreements, notices of violation (NOVs), interagency agreements, or equivalent state enforcement actions is

required to be examined (a finding under this checklist item will

have the enforcement action/identifying information as the citation). Referenced Enforcement Action: State of Texas v. U.S. Army Air Defense Artillery Center and Fort Bliss and Army Air Force Exchange System, Draft Agreed Final Judgement, dated November 26, 1997.

FINDING COMMENTS:

STATUS OF CORRECTION: INITIATED/WORK REQUEST SUBMITTED

CORRECTIVE ACTION: Resources have to be prioritized to ensure that all mandates decreed by the Office of the Attorney General are met. Fort Bliss is very susceptible to civil lawsuits and fines, if it does not comply completely with this final

judgement. In addition to paying for corrective actions on potential NOV's, Fort Bliss may potentially have to expend resources to settle lawsuits and fines.

CORRECTIVE ACTION TYPE: ADMINISTRATIVE OR POLICY CHANGE

COST: 0

1383 PROJECT NUMBER:

CORRECTIVE ACTION COMMENTS: INSTALLATION COMMENT: Agreement in process.

TRADOC COMMENT: Recommend changing the finding category to Class II. Rationale: Agreement is still in draft therefore, the installation is not out-of-compliance yet.

USACHPPM COMMENT: Finding shall remain a Class I finding. The draft Final Judgement against Fort Bliss was negotiated during 1996/97 and is based on past, repeated, and/or current violations. As late as April of 1997, Fort Bliss was inspected by the State and current violations were found and documented. Although the Final Judgement is in a "final draft" status, it is not technically agreed and accepted by Fort Bliss until the "responsible officials" have signed off on the judgements. The judgement is not a compliance agreement/plan, but a legal binding court-ordered judgement for a past or current violation(s).

A.90.6 #1 I FEDERAL CORRECTIVE ACTION

Air Emissions

FINDING ID: A-SC-09

MANUAL QUESTION NUMBER: A-090-006

FINDING CATEGORY: CLASS I

FINDING TYPE: Negative

EXISTING NOV: NO

LOCATION: DIRECTORATE OF ENVIRONMENT

IFS FACILITY NUMBER: 00515

FACILITY TYPE: ADMINISTRATIVE, COMMUNICATION FACILITIES

FINDING DESCRIPTION: The DOE has not submitted reports that it has purchased certified equipment as of 1993. Fort Bliss ensures that the equipment is certified, but did not submit notification to the EPA.

CRITERIA: 1) Installations/CW facilities recovering refrigerant from small appliances, MVACs, and MVAC-like appliances for the purpose of disposal of these appliances, are required to certify to the USEPA that appropriate recovery equipment has been acquired (40 CFR 82.162(c)). 2) Installations/CW facilities maintaining, servicing, or repairing appliances, except for MVACs, and installations/CW facilities disposing of appliances, except for small appliances and MVACs, are required to submit certification to the USEPA (40 CFR 82.162(a)).

FINDING COMMENTS: Staffing levels and the availability of resources to meet the requirements were not in place.

STATUS OF CORRECTION: INITIATED/WORK REQUEST SUBMITTED

CORRECTIVE ACTION: Contact the EPA regional office in reference to submitting certification reports for all CFC equipment at Fort Bliss. Submit reports to the EPA. Note that Fort Bliss DPWL is not responsible for all CFC recovery and recycling equipment used by major tenants. Estimated Cost: \$0

CORRECTIVE ACTION TYPE: ADMINISTRATIVE OR POLICY CHANGE

COST: 0

1383 PROJECT NUMBER:

CORRECTIVE ACTION COMMENTS: INSTALLATION COMMENT: Equipment is EPA certified. DOE will contact the EPA for requirement and will submit reports.

A.1.4 #1 II FEDERAL CORRECTIVE ACTION

Air Emissions

FINDING ID: A-SC-02

MANUAL QUESTION NUMBER: A-001-004

FINDING CATEGORY: CLASS II

FINDING TYPE: Negative

EXISTING NOV: NO

LOCATION: ORO GRANDE AND DONA ANA RANGES

IFS FACILITY NUMBER: MULT

FACILITY TYPE: TRAINING BLDGS, RANGES, COURSES, TROOP OPNS

FINDING DESCRIPTION: The Oro Grande and Dona Ana cantonment areas

have propane (LPG) storage areas that exceed the threshold planning quantities under the Clean Air Act, Section 112(r), Risk Management Plan (RMP) Rule. The RMP threshold quantity for the use or storage of propane is 10,000 pounds(lb.). The Oro Grande range has 3-4 propane tanks that store approximately 5,000 gallons (gal) each. The range at Dona Ana has four 1,000 gal propane tanks all interconnected. As per EPA guidance, any tank(s) that are interconnected are counted as a single storage vessel, therefore the total quantity is 4,000 gal. Based on the density of propane (5.41 lb/gal), each tank at Oro Grande is approx. 27,050 lb and 21,640 lb stored at Dona Ana cantonment area.

CRITERIA: Installations/CW facilities with processed involving regulated substances above specific threshold levels are required to develop a risk management program (RMP) (40 CFR 68.150) [May 1997].

FINDING COMMENTS:

STATUS OF CORRECTION: NO ACTION YET

CORRECTIVE ACTION: Fort Bliss will have to develop a Risk Management Program for the propane storage areas at the Oro Grande and Dona Ana Ranges. A RMP which is a summary of your program will have to be submitted to the EPA by June 1999. Based on RMP's prepared by USACHPPM, the average cost to develop a plan is approx. \$45K for one covered process. The RMP Rule has 3 distinct levels of compliance based on the potential offsite impact of a covered process. It is unlikely that the propane storage areas at the ranges will trigger the most stringent requirements (Program Level 3) with no offsite impact to human and environmental receptors. If the propane storage areas fall under Program Level 1, less resources will be needed to develop a program.

CORRECTIVE ACTION TYPE: OTHERS

COST: 45000

1383 PROJECT NUMBER:

CORRECTIVE ACTION COMMENTS: INSTALLATION COMMENT: Agree. DOW will develop the RMP for propane storage. DOE has an approved project for fiscal year 1999 for development of RMP's and funding for the propane plan will be provided by that project.

A.1.4 #2 II FEDERAL CORRECTIVE ACTION

Air Emissions

FINDING ID: A-SC-03

MANUAL QUESTION NUMBER: A-001-004

FINDING CATEGORY: CLASS II

FINDING TYPE: Negative

EXISTING NOV: NO

LOCATION: DPWL CENTRAL CHLORINE STORAGE

IFS FACILITY NUMBER: 01112

FACILITY TYPE: SUPPLY & STORAGE FACILITIES, LOGISTICS

FINDING DESCRIPTION: The central chlorine storage facility stores

approximately thirty 150 pound (lb) cylinders (7,500 lb) of chlorine. This exceeds the Risk Management Plan (RMP) threshold quantity of 2,500 lb for chlorine stored or used at one location.

CRITERIA: Installations/CW facilities with processed involving regulated substances above specific threshold levels are required to develop a risk management program (RMP) (40 CFR 68.150) [May 1997].

FINDING COMMENTS: The DPWL storage facility is inadequate for storing a chemical such as chlorine. The unfortified storage area gives no protection from the elements, tampering, human or equipment failure. It is very likely that a potential accident could occur at this facility. The DOE had proposed to decentralize the chlorine storage area, thus reducing the storage of chlorine in one location and elevating the need to develop a RMP if all areas stored less than 2,500 lb.

STATUS OF CORRECTION: NO ACTION YET

CORRECTIVE ACTION: Fort Bliss will have to develop a Risk Management Program for the chlorine storage area. A RMP plan which is a summary of your program will have to be submitted to the EPA by June 1999. Based on RMP's prepared by USACHPPM, the average cost to develop a program is approx. \$45K for one covered process. The RMP Rule has 3 distinct levels of compliance based on the potential offsite impact of a covered process. It is likely that the chlorine storage area will trigger the most stringent requirements (Program Level 3) with offsite impacts to human and environmental receptors. If the storage area is decentralized, the DOE should ensure that new storage facilities/areas have adequate protection (i.e., barricades, locked enclosed access, shaded area/shelter or enclosure). Because the storage facilities are located in populated work areas, chlorine shelters should be totally

enclosed and fitted with the necessary alarms/warning systems.
Estimated Cost: \$10,000 per shed.

CORRECTIVE ACTION TYPE: OTHERS
COST: 55000
1383 PROJECT NUMBER:

CORRECTIVE ACTION COMMENTS: INSTALLATION COMMENT:
Decentralization of chlorine storage facilities. Construct new storage facilities with adequate protection, enclosures and alarms. This corrective action will bring Fort Bliss below the threshold storage quantity for chlorine and thus eliminate the need for an RMP.

A.5.4.TX #1 III STATE CORRECTIVE ACTION Air Emissions

FINDING ID: A-SC-10

MANUAL QUESTION NUMBER: A-005-004-TX

FINDING CATEGORY: CLASS III

FINDING TYPE: Negative

EXISTING NOV: NO

LOCATION: DPWL POL TANK FARM

IFS FACILITY NUMBER: 11018

FACILITY TYPE: SUPPLY & STORAGE FACILITIES, LOGISTICS

FINDING DESCRIPTION: The secondary seal on the aboveground floating roof tank No. 11018 has a noticeable gap greater than 1.27 cm (as per 40 CFR 60.113b(b)(4)(ii)(B)). Because of the low vapor pressure of JP-8, the standards in 40 CFR 60.113(b)(4)(ii)(B) does not truly apply to this tank, but it was used as a benchmark as an acceptable standard by the assessor.

CRITERIA: Emissions capture and abatement equipment must be maintained in good working order and operated according to Texas requirements (30 TAC, Section 101.7(a)).

FINDING COMMENTS:

STATUS OF CORRECTION: INITIATED/WORK REQUEST SUBMITTED

CORRECTIVE ACTION: Repair secondary seal on tank No. 11018 to prevent damage to the primary seal. Estimated Cost: \$10,000.

CORRECTIVE ACTION TYPE: CORRECTIVE PROJECT

COST: 10000

1383 PROJECT NUMBER:

CORRECTIVE ACTION COMMENTS: INSTALLATION COMMENT: DPWL is checking the seal periodically and attempting to obtain DLA funding to repair the seal.

A.1.2.A #1 POSITIVE ARMY/DOD CORRECTIVE ACTION Air Emissions

FINDING ID: A-SC-07

MANUAL QUESTION NUMBER: A-001-002-A

FINDING CATEGORY: POSITIVE

FINDING TYPE: Positive

EXISTING NOV: NO

LOCATION: DOE

IFS FACILITY NUMBER: 00515

FACILITY TYPE: ADMINISTRATIVE, COMMUNICATION FACILITIES

FINDING DESCRIPTION: The Directorate of Environment personnel are developing a cost-effective solution to tracking data used to calculate air emissions from registered sources at Fort Bliss. Upon completion, this would alleviate the need for contractor prepared air emission inventories that are due annually to the TNRCC. This system will result in an estimated cost savings of approximately \$50,000 annually.

CRITERIA: Management and organization of paperwork, materials, and personnel should be done in a manner that prevents noncompliance and recurrence of noncompliance, precludes/minimizes regulatory enforcement actions (including warning letters etc.) promotes good public relations, and addresses systemic weaknesses in the overall operation of the program (MP).

FINDING COMMENTS:

STATUS OF CORRECTION:

CORRECTIVE ACTION: Ensure that emission calculations are updated with the latest EPA approved methods for estimating pollutant emission. The EPA, Office of Air Quality Planning and Standards (OAQPS) technology transfer bulletin board at <http://www.epa.oar.oaqps.gov> post all updates/changes and new methods.

CORRECTIVE ACTION TYPE: ADMINISTRATIVE OR POLICY CHANGE

COST: 0

1383 PROJECT NUMBER:

CORRECTIVE ACTION COMMENTS: Positive finding. No corrective action.

A.1.2.A #2 POSITIVE ARMY/DOD CORRECTIVE ACTION Air Emissions

FINDING ID: A-SC-08

MANUAL QUESTION NUMBER: A-001-002-A

FINDING CATEGORY: POSITIVE

FINDING TYPE: Positive

EXISTING NOV: NO

LOCATION: DPWL REFRIGERATION SHOP

IFS FACILITY NUMBER: 01116

FACILITY TYPE: SUPPLY & STORAGE FACILITIES, LOGISTICS

FINDING DESCRIPTION: The Directorate of Public Works and Logistics(DPWL) Refrigeration Shop personnel has developed standard operating procedures (SOP)for the management of CFCs. This task supercedes the requirements of the job involved in the repair and maintenance using CFCs. The SOP sites regulatory guidelines in the handling and management of CFCs at Fort Bliss.

CRITERIA: Management and organization of paperwork, materials, and personnel should be done in a manner that prevents noncompliance and recurrence of noncompliance, precludes/minimizes regulatory enforcement actions (including warning letters etc.) promotes good public relations, and addresses systemic weaknesses in the overall operation of the program (MP).

FINDING COMMENTS: The DOE have plans to develop a comprehensive CFC management plan that will incorporate the in-house SOP at the Refrigeration Shop.

STATUS OF CORRECTION:

CORRECTIVE ACTION:

CORRECTIVE ACTION TYPE:

COST: 0

1383 PROJECT NUMBER:

CORRECTIVE ACTION COMMENTS: Positive finding. No corrective action needed.

Cultural Resources Management Program

The Cultural Resources Management Program has made great strides since the last ECAS. The historic building program has completed a survey of all structures over 50 years of age and prepared a nomination packet for the Fort Bliss Historic District. The Fort Bliss Curation Facility meets the standards in 36 CFR 79 and the staff is working to process the entire collection of artifacts and documents. The archaeology program has adopted a management approach and begun to evaluate the over 16,000 sites on Fort Bliss for eligibility to the National Register of Historic Places. Fort Bliss also plans to evaluate the sites in the "Red Zones" the no access areas, and the "Green Zones" the limited use areas. The archaeologists have coordinated with the trainers to set priorities for the evaluation and testing in the Red and Green Zones focusing on those zones that the trainers believe are most critical for their mission. The post is working with the federally recognized Native American nations in order to comply with the Native American Graves Protection and Repatriation Act of 1990.

Issues of concern for the Fort Bliss CRM Program are coordination with the Directorate of Public Works and Logistics regarding projects that have the potential to effect historic structures. Also the Directorate of Contracts should develop an internal review procedure to ensure that projects that have the potential to impact historic structures are in compliance with Section 106 of the National Historic preservation Act of 1966 as amended.

C.5.2 #1 I FEDERAL CORRECTIVE ACTION

Cultural Resources

FINDING ID: CR-CM-03

MANUAL QUESTION NUMBER: C-005-002

FINDING CATEGORY: CLASS I

FINDING TYPE: Negative

EXISTING NOV: NO

LOCATION: DOC

IFS FACILITY NUMBER: 02021

FACILITY TYPE: ADMINISTRATIVE, COMMUNICATION FACILITIES

FINDING DESCRIPTION: The Directorate of Contracts awarded contracts prior to compliance with Section 106 of the National Historic Preservation Act of 1966 as amended.

CRITERIA: Prior to the start of a new undertaking, installations/CW facilities are required to take into account the effects of the undertaking on property included in or eligible for the National Register of Historic Places (36 CFR 800.1) [May 1995].

FINDING COMMENTS: The Directorate of Contracts expressed an interest in getting a list of all known eligible or potentially eligible structures on Fort Bliss. With this list they would be more able to ensure compliance with the National Historic Preservation Act of 1966 as amended.

STATUS OF CORRECTION: INITIATED/WORK REQUEST SUBMITTED

CORRECTIVE ACTION: Have DOC develop an internal process to ensure

compliance with Section 106 of the National Historic preservation

Act. This process would require coordination with the installation Historic preservation Officer or his designee prior to a contract being awarded that has the potential to effect a structure eligible or potentially eligible for inclusion to the National Register of Historic Places. Estimate Cost: Minimal.

CORRECTIVE ACTION TYPE: OPERATIONAL OR PROCEDURAL CHANGE

COST: 0

1383 PROJECT NUMBER:

CORRECTIVE ACTION COMMENTS: INSTALLATION COMMENT: The Directorate of Contracting awarded contracts prior to compliance with Section 106 of the National Historic Preservation Act of 1966 as amended. This is wrong information. We do not award without concurrence from DOE. The group from TRADOC had a problem with a porch we did but the compliance had been secured

before the award. There have been several meetings with DOE on the Operating Procedures. At the present time, DPW&L staffs before DOC receives the requirement. This is a DPW&L requirement and not the Directorate of Contracting. However, we agree to ensure that DOC receives that extra piece of paper.

USACHPPM COMMENT: It was stated that on occasion when federal funds had been expended for more than nondestructive planning on projects that did in fact include historic properties (defined as properties listed on or eligible for inclusion to the National Register of Historic Places). Those occasions when funds are expended for other than planning on historic properties prior to the completion of the "Section 106 Process" (which is explained in 36 CFR 800) are inconsistent with 36 CFR 800.3(c). Regulation 36 CFR 800.3(c) states: Section 106 requires the Agency Official to complete the section 106 process prior to the approval of the expenditures of any Federal Funds on the undertaking or prior to the issuance of any license or permit. If contracts on historic properties have slipped through the system in the past then it would benefit the Fort Bliss DOC to prevent it from happening again.

C.5.3 #1 I FEDERAL CORRECTIVE ACTION

Cultural Resources

FINDING ID: CR-CM-04

MANUAL QUESTION NUMBER: C-005-003

FINDING CATEGORY: CLASS I

FINDING TYPE: Negative

EXISTING NOV: NO

LOCATION: DPWL

IFS FACILITY NUMBER: 08777

FACILITY TYPE: HOUSING & COMMUNITY FACILITIES

FINDING DESCRIPTION: Service orders and the work done to fulfill them are undertakings as defined in 36 CFR 800 "Protection of Historic Properties". These small projects have the potential to effect the historic Army family houses on Fort Bliss. Currently, the requirements of the Fort Bliss programmatic agreement on historic properties are not being met. The Texas State Historic Preservation Officer is not consulted on these undertakings. The Advisory Council of Historic Preservation is not provided an opportunity to comment on these undertakings.

CRITERIA: The installation/CW facility is required to consult with the SHPO during the identification, location, and evaluation of historic properties and in assessing the effect of any undertaking on historic property (36 CFR 800.4 and 800.5).

FINDING COMMENTS: Small projects like changing light fixtures or plumbing fixtures have the potential to effect a historic property. The Fort Bliss Historic Preservation Officer is currently planning to develop guidance for these small projects that if followed by craftsmen will ensure compliance.

STATUS OF CORRECTION: INITIATED/WORK REQUEST SUBMITTED
CORRECTIVE ACTION: Develop a process that ensures that the installation historic preservation officer reviews any undertaking that could effect a structure that is eligible or potentially eligible for the National Register of Historic Places.
Estimated
Cost: Minimal.

CORRECTIVE ACTION TYPE: OPERATIONAL OR PROCEDURAL CHANGE

COST: 0

1383 PROJECT NUMBER:

CORRECTIVE ACTION COMMENTS: INSTALLATION COMMENT: Concur.
DPWL and DOE are working together to develop a comprehensive review process. One action being taken is to put a list of all historic properties in a public folder on e-mail. Anyone undertaking work at Fort Bliss can check the folder and take appropriate steps to comply.

C.2.1.A #1 III ARMY/DOD CORRECTIVE ACTION Cultural Resources

FINDING ID: CR-CM-02

MANUAL QUESTION NUMBER: C-002-001-A

FINDING CATEGORY: CLASS III

FINDING TYPE: Negative

EXISTING NOV: NO

LOCATION: DOE

IFS FACILITY NUMBER: 00624

FACILITY TYPE: TRAINING BLDGS, RANGES, COURSES, TROOP OPNS

FINDING DESCRIPTION: Red Zone 6 had been entered by a tracked vehicle some time after the protective berm had been placed around it. Also, some of the signs stating that the area was off limits, by order of the Commanding General, had been removed. This is counter to Fort Bliss policy.

CRITERIA: Fort Bliss policy as stated in "Standard Operating Procedures for Weapons Firing and Maneuver Area Use" dated 15 July

1996 page E-6-1, is that all "Red Zones" are off limits to all vehicular activity.

FINDING COMMENTS:

STATUS OF CORRECTION: INITIATED/WORK REQUEST SUBMITTED

CORRECTIVE ACTION: Work with Range Operations in order to reinforce that all units training on Fort Bliss must comply with the Commanding General's policies. Estimated Cost: Minimal.

CORRECTIVE ACTION TYPE: TRAINING

COST: 0

1383 PROJECT NUMBER:

CORRECTIVE ACTION COMMENTS: INSTALLATION COMMENT: Signs completed. Corrective action is an ongoing process. "Off Limits" signs have been replaced. This issue has been added to the Unit Commander's Course taught bi-monthly at McGregor Range.

C.20.1 #1 III FEDERAL CORRECTIVE ACTION Cultural Resources

FINDING ID: CR-CM-01

MANUAL QUESTION NUMBER: C-020-001

FINDING CATEGORY: CLASS III

FINDING TYPE: Negative

EXISTING NOV: NO

LOCATION: DOE

IFS FACILITY NUMBER: 00624

FACILITY TYPE: TRAINING BLDGS, RANGES, COURSES, TROOP OPNS

FINDING DESCRIPTION: Much of the Fort Bliss archaeological collection had not been processed and curated in accordance with 36 CFR 79 "Curation of Federally Owned Archaeological collections". The Fort Bliss curation facility is in compliance with 36 CFR 79 but not all of the artifactual or documentary material had been processed.

CRITERIA: Installations/CW facilities responsible for the long-term management and preservation of pre-existing collections are subject to certain regulations regarding curation (36 CFR 79.5(a)).

FINDING COMMENTS:

STATUS OF CORRECTION: INITIATED/WORK REQUEST SUBMITTED

CORRECTIVE ACTION: Continue to support at the present level the processing of all artifactual and documentary material in the Fort

Bliss collection. Estimated Cost: Minimal.

CORRECTIVE ACTION TYPE: OTHERS

COST: 0

1383 PROJECT NUMBER:

CORRECTIVE ACTION COMMENTS: INSTALLATION COMMENT: Agree.

C.1.2.A #1 POSITIVE ARMY/DOD CORRECTIVE ACTION Cultural
Resources

FINDING ID: CR-CM-05

MANUAL QUESTION NUMBER: C-001-002-A

FINDING CATEGORY: POSITIVE

FINDING TYPE: Positive

EXISTING NOV: NO

LOCATION: DOE

IFS FACILITY NUMBER: 00624

FACILITY TYPE: TRAINING BLDGS, RANGES, COURSES, TROOP OPNS

FINDING DESCRIPTION: The Cultural Resources Management Program has made great strides since the last ECAS. The historic building program has completed a survey of all structures over 50 years of age and prepared a nomination packet for the Fort Bliss Historic District. The Fort Bliss curation facility meets the standards in 36 CFR 79 and the staff is working to process the entire collection of artifacts and documents. The archaeology program has adopted a management approach and begun to evaluate the over 16,000 sites on Fort Bliss for eligibility to the National Register of Historic Places. The post is working with the federally recognized Native American nations in order to comply with the Native American Graves Protection and Repatriation Act of 1990.

CRITERIA: Management and organization of paperwork, materials, and personnel should be done in a manner that prevents noncompliance and recurrence of noncompliance, precludes/minimizes regulatory enforcement actions (including warning letters etc.) promotes good public relations, and addresses systemic weaknesses in the overall operation of the program (MP).

FINDING COMMENTS:

STATUS OF CORRECTION:

CORRECTIVE ACTION:

CORRECTIVE ACTION TYPE:

COST: 0

1383 PROJECT NUMBER:

CORRECTIVE ACTION COMMENTS: Positive finding. No corrective action needed.

HAZARDOUS MATERIALS MANAGEMENT

Overall, the Hazardous Materials Management Program is in excellent condition. The Installation Safety Office, with the exception of the MEDDAC manages the Fort Bliss Hazard Communication (HAZCOM) Program.

The installation Safety Office provides both initial and refresher HAZCOM training to all facilities at Fort Bliss. Except for the Directorate of Public Works and Logistics (DPWL) facilities, all of the activities visited had received HAZCOM training.

All facilities visited had Material Safety Data Sheets (MSDSs) readily available for products used by personnel, and were properly labeling their containers except for the Army and Airforce Exchange Service (AAFES).

Compressed gas cylinders were not being stored properly at two DPWL facilities.

Several facilities did not have adequate emergency eyewash/safety shower facilities provided for a variety of reasons (i.e., flushing streams were uneven and too low on one side; blocked; misused as a hand washing device; did not work at all; had clogged flushing streams; required too many steps to operate; or did not exist).

HM.2.1 #1 HS FEDERAL CORRECTIVE ACTION Hazardous Materials

FINDING ID: HM-JH-01

MANUAL QUESTION NUMBER: HM-002-001

FINDING CATEGORY: HEALTH/SAFETY

FINDING TYPE: Negative

EXISTING NOV: NO

LOCATION: DPWL

IFS FACILITY NUMBER: MULT

FACILITY TYPE: MAINTENANCE FACILITIES

FINDING DESCRIPTION: The Directorate of Public Works and Logistics (DPWL) Aircraft Maintenance Sheet Metal Shop, Bldg# 11108, had a stand-alone plumbed emergency eyewash/safety shower facility that was inaccessible. In addition to being blocked, the eyewash/shower was not activated at least weekly to verify that they work properly. The Fort Bliss Auto Shop, Bldg# 820, had a stand-alone plumbed eyewash in work bay# 20 that was inaccessible.

CRITERIA: Installations must provide for immediate emergency use of suitable facilities for quick drenching and flushing of eyes and body within the work area. Emergency eyewash/shower facilities should be activated at least weekly to verify that they operate properly. The water should be allowed to run at least three minutes to remove stagnant water and any harmful bacteria that may be present in the water supply lines [29 CFR 1910.151 (c)] and American National Standard (ANSI) Z358.1-1990, for emergency eyewash and shower equipment.

FINDING COMMENTS: The supervisor of the work area in Bldg# 11108 stated that the eyewash/shower facility was not flushed weekly because there was no floor drain (since there was no regulatory requirement for one), and they did not want the water to run out onto the floor.

STATUS OF CORRECTION: COMPLETE

CORRECTIVE ACTION: Establish a program to check emergency eyewash/shower facilities at least daily to ensure that they are not blocked from use. Also, flush the water lines of stand-alone emergency eyewash/shower facilities at least weekly for three minutes to remove potentially harmful bacteria and to ensure that the facilities are functional. Estimated Cost: Minimal.

CORRECTIVE ACTION TYPE: OPERATIONAL OR PROCEDURAL CHANGE
COST: 0

1383 PROJECT NUMBER:

CORRECTIVE ACTION COMMENTS: INSTALLATION COMMENT: Corrective action completed.

TRADOC COMMENT: Recommend adding the following: "Although a floor drain is not specifically required by regulation, a floor drain is generally accepted as being an integral part of an emergency shower when installed in a building. This report should also recommend installation of a shower drain.

USACHPPM COMMENT: Does not concur with TRADOC comment.

HM.2.1 #2 HS FEDERAL CORRECTIVE ACTION Hazardous Materials

FINDING ID: HM-JH-02

MANUAL QUESTION NUMBER: HM-002-001

FINDING CATEGORY: HEALTH/SAFETY

FINDING TYPE: Negative

EXISTING NOV: NO

LOCATION: INSTALLATION SAFETY OFFICE

IFS FACILITY NUMBER: MULT

FACILITY TYPE: MAINTENANCE FACILITIES

FINDING DESCRIPTION: The Directorate of Public Works and Logistics (DPWL) Refrigeration Shop, Bldg# 1116 did not provide personnel with Hazard Communication (HAZCOM) training. The Biggs Army AirField (BAAF), Test and Evaluation Services Command (TESCO)/DYN Corp. Threat Aviation (Army contractor), Bldg# 11304, was not documenting HAZCOM training.

CRITERIA: Installations are required to have a written hazard communication program and provide personnel with effective information and training on hazardous chemicals in their work area at the time of their initial assignment, and whenever a new physical or health hazard is introduced into their work area (29 CFR 1910.1200).

FINDING COMMENTS:

STATUS OF CORRECTION: INITIATED/WORK REQUEST SUBMITTED

CORRECTIVE ACTION: Ensure that all personnel are provided with HAZCOM training as necessary. Document HAZCOM training on DD Form 1556 for each individual and maintain documentation in their work area and in their personnel files. Estimated Cost: Minimal.

CORRECTIVE ACTION TYPE: TRAINING

COST: 0

1383 PROJECT NUMBER:

CORRECTIVE ACTION COMMENTS: INSTALLATION COMMENT: The Safety Office has scheduled training for DPWL during February 1998. This training (and all future training) will be documented on Form 1556. Documentation of HAZCOM training is checked during DOE quarterly inspections.

TRADOC COMMENT: DD Form 1556 is no longer required, however, it is considered to be the best method of documentation. Recommend adding the following: "Installation Safety Office should

follow-up to ensure training is provided and properly documented."

HM.2.1 #3 HS FEDERAL CORRECTIVE ACTION Hazardous Materials

FINDING ID: HM-JH-04

MANUAL QUESTION NUMBER: HM-002-001

FINDING CATEGORY: HEALTH/SAFETY

FINDING TYPE: Negative

EXISTING NOV: NO

LOCATION: WBAMC

IFS FACILITY NUMBER: 07777

FACILITY TYPE: HOSPITAL & MEDICAL FACILITIES

TENANT NAME: WBAMC

FINDING DESCRIPTION: Several areas at William Beaumont Army Medical Center (WBAMC), Bldg# 7777, did not have adequate emergency eyewash/shower facilities where injurious/corrosive materials were handled. The Cytology Room# 3215, the Radiology Chemical Processing Area, and the Infectious Waste Storage Room# 3170 had inadequate eyewash devices. The flushing streams were uneven and too low on one side and were in need of repair. The Radiology Film Assembly Room# 3362A did not have an emergency shower facility (in addition to the eyewash device that was provided). In this area significant quantities of injurious and corrosive materials may be splashed onto the body of personnel while adding/mixing chemicals.

CRITERIA: Installations must provide for immediate emergency use of suitable facilities for quick drenching and flushing of eyes and body within the work area. Emergency eyewash/shower facilities should be activated at least weekly to verify that they operate properly. The water should be allowed to run at least three minutes to remove stagnant water and any harmful bacteria that may be present in the water supply lines [29 CFR 1910.151 (c)] and American National Standard (ANSI) Z358.1-1990, for emergency eyewash and shower equipment.

FINDING COMMENTS:

STATUS OF CORRECTION:

CORRECTIVE ACTION: Install an emergency shower facility at the Radiology Chemical Processing area. Also, repair the emergency eyewash devices in the Cytology room and Infectious Waste Storage room. Follow the guidance provided in ANSI Z358.1-1990 to maintain equal flushing streams. Establish a program to check emergency eyewash/shower facilities at least weekly to flush

water lines for three minutes to remove potentially harmful bacteria and to ensure that the facilities are functional. Document weekly checks. Estimated Cost: \$2,000.

CORRECTIVE ACTION TYPE: EQUIPMENT PROCUREMENT OR CHANGE
COST: 2000

1383 PROJECT NUMBER:

CORRECTIVE ACTION COMMENTS:

HM.2.1 #4 HS FEDERAL CORRECTIVE ACTION Hazardous Materials

FINDING ID: HM-JH-05

MANUAL QUESTION NUMBER: HM-002-001

FINDING CATEGORY: HEALTH/SAFETY

FINDING TYPE: Negative

EXISTING NOV: NO

LOCATION: AAFES

IFS FACILITY NUMBER: 01735

FACILITY TYPE: SUPPLY & STORAGE FACILITIES, LOGISTICS

TENANT NAME: AAFES

FINDING DESCRIPTION: The Army and Airforce Exchange Service (AAFES) Tire Center at the main Post Exchange (PX), Bldg# 1735, did not have an adequate emergency eyewash device. The plumbed eyewash device that was available for emergency use was being improperly used as a hand-washing device. Soap and a scrub brush were stored in the bowl of the eyewash. This could result in personnel getting soap in their eyes during use of the eyewash device.

CRITERIA: Installations must provide for immediate emergency use of suitable facilities for quick drenching and flushing of eyes and body within the work area. Emergency eyewash/shower facilities should be activated at least weekly to verify that they operate properly. The water should be allowed to run at least three minutes to remove stagnant water and any harmful bacteria that may be present in the water supply lines [29 CFR 1910.151 (c)] and American National Standard (ANSI) Z358.1-1990, for emergency eyewash and shower equipment.

FINDING COMMENTS:

STATUS OF CORRECTION: COMPLETE

CORRECTIVE ACTION: Prohibit the misuse of the emergency eyewash in the Tire Center. Establish a program to check the emergency eyewash device at least weekly to flush water lines for three minutes to remove potentially harmful bacteria and to ensure that the device is functional. Document weekly checks. Estimated Cost: Minimal.

CORRECTIVE ACTION TYPE: TRAINING

COST: 0

1383 PROJECT NUMBER:

CORRECTIVE ACTION COMMENTS: INSTALLATION COMMENT: Corrective action has been taken and associates have been trained on the proper use of the eyewash device. The Sales Area Manager will

conduct weekly checks on the operation of the device as prescribed.

HM.2.1 #5 HS FEDERAL CORRECTIVE ACTION Hazardous Materials

FINDING ID: HM-JH-06

MANUAL QUESTION NUMBER: HM-002-001

FINDING CATEGORY: HEALTH/SAFETY

FINDING TYPE: Negative

EXISTING NOV: NO

LOCATION: AAFES

IFS FACILITY NUMBER: MULT

FACILITY TYPE: SUPPLY & STORAGE FACILITIES, LOGISTICS

TENANT NAME: AAFES

FINDING DESCRIPTION: The Army and Airforce Exchange Service (AAFES) Main Post Exchange (PX), Bldg# 1735, and the AAFES PXtra, Bldg# 1611, did not have copies of Material Safety Data Sheets (MSDSs) readily available on site for chemical products that were stored and handled by personnel. This information is essential for the safe treatment of personnel in the event of a chemical splash. Currently, AAFES personnel are required to dial an (toll-free) 800 number to the AAFES headquarters facility to request an MSDS to be faxed.

CRITERIA: Installations are required to have a written hazard communication program that is designed to provide all employees with information about the hazardous chemicals to which they are exposed to. Copies of chemical inventories [29 CFR 1910.1200 (e)(1)(i)] and training records [29 CFR 1910.1200 (h) (10)] should be available on site. Facilities shall maintain in the workplace copies of the required MSDSs for each hazardous chemical and shall ensure that they are readily accessible during each work shift to employees when they are in their work area [29 CFR 1910.1200 (8)].

FINDING COMMENTS:

STATUS OF CORRECTION:

CORRECTIVE ACTION: Maintain readily available hard copies in the workplace of MSDSs for each hazardous chemical used/stored at all AAFES facilities. Estimated Cost: Minimal.

CORRECTIVE ACTION TYPE: ADMINISTRATIVE OR POLICY CHANGE

COST: 0

1383 PROJECT NUMBER:

CORRECTIVE ACTION COMMENTS: INSTALLATION COMMENTS: AAFES has

established a contract with 3E Company, Inc. to maintain a database of Material Safety Data Sheets (MSDS) for all potentially hazardous products used, sold, stored, or transported; by AAFES resources. AAFES activities may contact this service for MSDS information at any time (24hrs/day, 7days/week) using a toll free (800 or overseas equivalent) telephone number. The service will then fax an MSDS back to the AAFES activity when needed. The service is designed to fulfill the OSHA requirements for maintaining readily accessible copies of MSDS at all AAFES activities. OSHA HAZCOM (29 CFR 1910.1200) requires that activities (retail/resale products are exempt from MSDS requirements). Fax or computer access was approved by OSHA as meeting the "readily accessible" requirement in the Federal Register Vol. 59, No. 27 on 9 February 1994. Hard copies of MSDS are no longer required by OSHA and will no longer be maintained by AAFES activities. This service will only be used in case of a spill or emergency; any employee or customer request; or any request from a state regulator, OSHA, ECAMP or ECAS inspector. It is not available for the purpose of maintaining hard copies by AAFES activities or by the installation. This service will enable AAFES activities to maintain better compliance with OSHA requirements.

USACHPPM COMMENTS: The AAFES method for obtaining MSDSs does not meet the requirements of 29 CFR 1910.1200(8). The requirement states that facilities shall maintain in the workplace copies of the required MSDSs for each hazardous chemical and shall ensure that they are readily accessible during each work shift to employees when they are in their work area. The necessity for the MSDSs to be readily accessible to employees is to help ensure the safety of the personnel and customers at the retail establishment in the event of a spill or emergency hazardous materials release. The Health Hazard Data section in MSDSs provides information pertaining to the signs and symptoms of overexposure to the referenced chemical and emergency first aid procedures to employ in the vent of overexposure to the chemical. This information is time sensitive and can dramatically improve the physical and medical outcome of individual(s) affected by the emergency hazardous materials release. The time delay that is created by calling the 24-hour response contractor and receiving the faxed response is inherently hazardous and is easily eliminated by maintaining MSDSs for each workplace hazardous chemical in an area readily accessible to all personnel.

The AAFES method for obtaining MSDSs also does not allow for 24-hour access to the MSDSs. The Environmental Compliance Assessment System (ECAS) assessments of several AAFES facilities show that many of these facilities do not have a facsimile machine located on site. Instead, these sites rely on receiving the MSDS facsimiles from the AAFES Main Exchange located on base. Several service stations (gas stations) that do not have facsimile machines are located in areas that are not in close proximity to the main exchange and/or maintain business hours that differ from the main exchange. The aforementioned conditions render it impossible for these service stations to receive MSDSs on a 24-hour basis.

USACHPPM does not believe that the 3E Program is an effective means of maintaining MSDSs. This decision is based upon the information presented above and consultation with a representative at the Occupational Safety and Health Administration (OSHA). The representative from OSHA stated that MSDS information received over the phone does not adequately meet the requirements of 29 CFR 1910.1200(8). The OSHA representative also explained that the only acceptable way of complying with the requirements of 29 CFR 1910.1200(8) is to maintain hard copies of MSDSs at each individual place of business, to include tenant facilities that are operated under the guidance of a larger facility (e.g. service stations and AAFES Main Exchange). Exceptions to this requirement include small, temporary work sites. The representative from OSHA also stated that he had no knowledge of the 3E Program and that OSHA never endorses any private-sector company.

HM.5.1.TX #1 HS STATE CORRECTIVE ACTION Hazardous Materials

FINDING ID: HM-JH-07

MANUAL QUESTION NUMBER: HM-005-001-TX

FINDING CATEGORY: HEALTH/SAFETY

FINDING TYPE: Negative

EXISTING NOV: NO

LOCATION: INSTALLATION SAFETY OFFICE

IFS FACILITY NUMBER: 00516

FACILITY TYPE: ADMINISTRATIVE, COMMUNICATION FACILITIES

FINDING DESCRIPTION: The Fort Bliss Safety Office does not maintain a complete inventory of all hazardous materials used on post.

CRITERIA: A workplace chemical list must be compiled and maintained (HSC, Section 502.005).

FINDING COMMENTS:

STATUS OF CORRECTION: INITIATED/WORK REQUEST SUBMITTED

CORRECTIVE ACTION: The Safety Office must obtain an inventory of all the hazardous materials used on post.

CORRECTIVE ACTION TYPE: ADMINISTRATIVE OR POLICY CHANGE

COST: 0

1383 PROJECT NUMBER:

CORRECTIVE ACTION COMMENTS: INSTALLATION COMMENT: This finding should be closed out over the next three years as the Hazmart becomes fully operational. The Safety Office does not have the resources to inventory all hazmats on post.

HM.45.1 #1 HS FEDERAL CORRECTIVE ACTION Hazardous Materials

FINDING ID: HM-JH-03

MANUAL QUESTION NUMBER: HM-045-001

FINDING CATEGORY: HEALTH/SAFETY

FINDING TYPE: Negative

EXISTING NOV: NO

LOCATION: DPWL

IFS FACILITY NUMBER: MULT

FACILITY TYPE: MAINTENANCE FACILITIES

FINDING DESCRIPTION: Compressed gas cylinders were not secured with a chain or device to prevent them from falling. This deficiency was noted at the following Directorate of Public Works and Logistics (DPWL) facilities: Roads and Grounds Motorpool, behind Bldg# 1073; and Supply, adjacent to Bldg# 2528.

CRITERIA: The in-plant storage, handling, and utilization of all compressed gases in cylinders, portable tanks, rail tankers, or motor vehicles must be done according to the Compressed Gas Association Pamphlet P-1-11965 (29 CFR 1910.101).

FINDING COMMENTS:

STATUS OF CORRECTION: COMPLETE

CORRECTIVE ACTION: Secure the compressed gas cylinders with a chain or device in an appropriate cage or rack designed for that purpose, and replace caps on cylinders when they are not in use. Train personnel in the safe handling and storage of compressed gas cylinders. Estimated Cost: Minimal.

CORRECTIVE ACTION TYPE: OPERATIONAL OR PROCEDURAL CHANGE

COST: 0

1383 PROJECT NUMBER:

CORRECTIVE ACTION COMMENTS: INSTALLATION COMMENT: Corrective action completed.

HAZARDOUS WASTE MANAGEMENT

The installation Hazardous Waste Program has greatly improved since the last ECAS (1994). Key elements related to this improvement include the initiation of quarterly inspections of hazardous waste accumulation points and the establishment of monthly hazardous waste generator awareness meetings. Significant upgrading of the permitted hazardous waste storage facility, presently operated by the Defense Reutilization and Marketing Office (DRMO), has also contributed to the overall improvement in the installation hazardous waste program. Presently the installation holds Resource Conservation and Recovery Act (RCRA) permits for the hazardous waste storage facility and for an open detonation site located on McGregor Range in New Mexico. The Directorate of Environment (DOE) has a list of approximately seventy hazardous waste accumulation points and nine 90-day storage sites. There are five inactive 90-day sites on the main post. There are three sites at the ranges, which are managed by DOE personnel and are active only for six weeks in May and June during the Roving Sands exercises, and one site at Biggs Army Airfield. The latter site is operated by a contractor (Raytheon) and is active through the year. Thirty-five waste accumulation points and the one active 90-day site were inspected. With few exceptions, the majority of waste generated is managed through DRMO contracts.

The Regulated Medical Waste (RMW) program located on Ft Bliss is well managed. Approximately 140,000 pounds of RMW is generated annually by the William Beaumont Army Medical Center (WBAMC), DENTACs, Veterinary Clinics, and the Troop Medical Clinics. The Environmental Services Branch located at WBAMC coordinates the collection and disposal of all RMW on Ft Bliss. WBAMC has contracted with the company Med-Compliance. Med-Compliance makes 3 pick-ups a week. All necessary paperwork associated with disposal and destruction of RMW is well maintained and accessible. Containers used to transport and store RMW are clean and properly labeled and are provided by Med-Compliance. Segregation issues are addressed during monthly RMW training sessions.

HW.2.1 #1 I FEDERAL CORRECTIVE ACTION

Hazardous Waste

FINDING ID: HW-KM-03

MANUAL QUESTION NUMBER: HW-002-001

FINDING CATEGORY: CLASS I

FINDING TYPE: Negative

EXISTING NOV: NO

LOCATION: WBAMC/PHARMACY

IFS FACILITY NUMBER: 07777

FACILITY TYPE: HOSPITAL & MEDICAL FACILITIES

TENANT NAME: WILLIAM BEAUMONT AMC

FINDING DESCRIPTION: Hazardous waste was transported on public roads without proper documentation (hazardous waste manifest). William Beaumont Army Medical Center (WBAMC) transports expired pharmaceuticals approximately 5 miles on public roads to the Material Branch located at Biggs Army Airfield (Bldg# 11156). Some pharmaceuticals fall under the Resource Conservation and Recovery Act (RCRA) upon their expiration and must be managed as a hazardous waste. Those expired items must be manifested as required under RCRA if they are to be transported on public roads (40 CFR 262.20).

CRITERIA: A generator who transports, or offers for transportation, hazardous waste for offsite treatment, storage, or disposal must prepare a Manifest... 40 CFR 262.20(a).

FINDING COMMENTS: This finding was identified by a Command Logistic Review Team (CLRT) inspection in April 1995 and December 1996.

STATUS OF CORRECTION: INITIATED/WORK REQUEST SUBMITTED

CORRECTIVE ACTION: 1) Review the pharmacy inventory and identify those pharmaceutical items which are managed under RCRA when expired. Remove and transport to the Materials Branch (Bldg# 11156) those items from the shelf prior to their expiration. In doing so, hazardous waste manifests will not be required when transported across public roads. 2) Provide hazardous waste training to pharmacy personnel to enable them to identify expired pharmaceuticals which are hazardous waste. Estimated Cost: \$4,000.

CORRECTIVE ACTION TYPE: OTHERS

COST: 4000

1383 PROJECT NUMBER:

CORRECTIVE ACTION COMMENTS: INSTALLATION COMMENT: Expired pharmaceuticals will be stored at a 90-day facility at WBAMC.

Establish a 90-day hazardous waste accumulation site at building #7777. Train hazardous waste handlers in compliance with 40 CFR 265.16. Implement contractor pick-up of expired pharmaceuticals stored at 90-day sites.

HW.2.1 #2 I FEDERAL CORRECTIVE ACTION

Hazardous Waste

FINDING ID: HW-KM-06

MANUAL QUESTION NUMBER: HW-002-001

FINDING CATEGORY: CLASS I

FINDING TYPE: Negative

EXISTING NOV: NO

LOCATION: DPWL/POWER PLANT

IFS FACILITY NUMBER: 05898

FACILITY TYPE: MAINTENANCE FACILITIES

FINDING DESCRIPTION: A Hazardous Waste Accumulation Point (HWAP) was not being managed properly. Wastes were not being turned in a timely manner, being labeled properly, or located within a controlled area. There were three drums of used fuel filters which exceeded the 55-gallon limit for HWAPs. The HWAP was also located in an unsecured area outside the control of the DPWL personnel.

CRITERIA: Hazardous Waste Accumulation Points (HWAPs) must meet specific management guidelines. 40 CFR 262.24 (c)(1)

FINDING COMMENTS:

STATUS OF CORRECTION: INITIATED/WORK REQUEST SUBMITTED

CORRECTIVE ACTION: Provide training to DPWL/Power Plant personnel with regards to the operation and maintenance of HWAP and incorporate this HWAP into the Directorate of Environment (DOE) quarterly inspection schedule. Estimated Cost: \$3,000.

CORRECTIVE ACTION TYPE: TRAINING

COST: 3000

1383 PROJECT NUMBER:

CORRECTIVE ACTION COMMENTS: INSTALLATION COMMENT: Inspect power plant quarterly. Train power plant personnel in accordance with 40 CFR 265.16 Require personnel to attend monthly hazardous waste generators meetings.

HW.10.1 #1 I FEDERAL CORRECTIVE ACTION Hazardous Waste

FINDING ID: HW-MB-01

MANUAL QUESTION NUMBER: HW-010-001

FINDING CATEGORY: CLASS I

FINDING TYPE: Negative

EXISTING NOV: NO

LOCATION: DPWL

IFS FACILITY NUMBER: 11108

FACILITY TYPE: MAINTENANCE FACILITIES

FINDING DESCRIPTION: The Directorate of Public Works and Logistics (DPWL) DOSS Aviation Maintenance Shop, Bldg# 11108, generated waste from a plastic bead paint stripping operation. This waste had not been tested for applicable hazardous waste characteristics.

CRITERIA: Installations/CW facilities that generate solid wastes must determine if the wastes are hazardous wastes (40 CFR 261.3, 261.4(b), 261.21 through 261.24, and 262.11) [June 1995].

FINDING COMMENTS:

STATUS OF CORRECTION: INITIATED/WORK REQUEST SUBMITTED

CORRECTIVE ACTION: Test the paint stripping waste for applicable hazardous waste characteristics. Estimated Cost: \$1,000 per sample.

CORRECTIVE ACTION TYPE: OTHERS

COST: 1000

1383 PROJECT NUMBER:

CORRECTIVE ACTION COMMENTS: INSTALLATION COMMENT: Paint stripping waste was sampled the week of 26 Jan 98. Analytical results are expected in early February.

HW.10.1 #2 I FEDERAL CORRECTIVE ACTION Hazardous Waste

FINDING ID: HW-MB-02

MANUAL QUESTION NUMBER: HW-010-001

FINDING CATEGORY: CLASS I

FINDING TYPE: Negative

EXISTING NOV: NO

LOCATION: DCA

IFS FACILITY NUMBER: 00820

FACILITY TYPE: MAINTENANCE FACILITIES

FINDING DESCRIPTION: One drum of paint waste had been stored for an extended period of time outside of the Auto Craft Shop, Bldg# 820. No hazardous waste determination of the drum contents had been done.

CRITERIA: Installations/CW facilities that generate solid wastes must determine if the wastes are hazardous wastes (40 CFR 261.3, 261.4(b), 261.21 through 261.24, and 262.11) [June 1995].

FINDING COMMENTS:

STATUS OF CORRECTION: COMPLETE

CORRECTIVE ACTION: Test paint waste for applicable hazardous waste characteristics. Estimated Cost: \$1,000. Add this activity to the Directorate of Environment (DOE) list of quarterly site inspections. Estimated Cost: Minimal.

CORRECTIVE ACTION TYPE: OPERATIONAL OR PROCEDURAL CHANGE

COST: 1000

1383 PROJECT NUMBER:

CORRECTIVE ACTION COMMENTS: INSTALLATION COMMENT: Hazardous waste determination was done by process knowledge and the waste was turned in to DRMO or disposal. Corrective action completed.

TRADOC COMMENT: The root cause for this finding of "lack of funds for compliance" may indicate a much larger systemic problem with the MWR Auto Craft Shop.

USACHPPM COMMENT: Root cause code has been changed.

HW.10.1 #3 I FEDERAL CORRECTIVE ACTION Hazardous Waste

FINDING ID: HW-MB-04

MANUAL QUESTION NUMBER: HW-010-001

FINDING CATEGORY: CLASS I

FINDING TYPE: Negative

EXISTING NOV: NO

LOCATION: INST

IFS FACILITY NUMBER: INST

FACILITY TYPE: TRAINING BLDGS, RANGES, COURSES, TROOP OPNS

FINDING DESCRIPTION: There was little coordination between Ammunition Supply Point (ASP), Range Control, and Directorate of Environment (DOE) personnel relating to the management of spent munitions that are taken off the ranges excluding those that are managed as scrap metal.

CRITERIA: Installations/CW facilities that generate solid wastes must determine if the wastes are hazardous wastes (40 CFR 261.3, 261.4(b), 261.21 through 261.24, and 262.11) [June 1995].

FINDING COMMENTS: The spent M5HC smoke pot has been determined, by several sources, to be a hazardous waste (D008).

STATUS OF CORRECTION: INITIATED/WORK REQUEST SUBMITTED

CORRECTIVE ACTION: Determine what types of spent munitions are taken off the ranges and potentially disposed at the installation landfill. Collect and sample these munitions and analyze them for hazardous waste characteristics. Estimated Cost: \$1,000.

CORRECTIVE ACTION TYPE: OPERATIONAL OR PROCEDURAL CHANGE

COST: 1000

1383 PROJECT NUMBER:

CORRECTIVE ACTION COMMENTS: INSTALLATION COMMENT: Implementing corrective action.

TRADOC COMMENT: The lead for this is not DOE but DPW-L. DOD and the EPA are still negotiating the definition of a spent munition and when does the munition become waste.

USACHPPM COMMENT: Troop units that expend M5-HC smoke pots during training are required to police the training area. The spent smoke pots are either placed in a range dumpster for disposal in a RCRA-D landfill or in rare cases they are returned to the ASP Residue Yard. Since the smoke pot may exhibit the hazardous waste characteristic of toxicity, this solid waste must be characterized and managed accordingly. A USACHPPM study completed in January

1998, recommends that spend M5-HC smokes be managed as hazardous once they are removed from the training range.

HW.10.1 #4 I FEDERAL CORRECTIVE ACTION Hazardous Waste

FINDING ID: HW-MB-05

MANUAL QUESTION NUMBER: HW-010-001

FINDING CATEGORY: CLASS I

FINDING TYPE: Negative

EXISTING NOV: NO

LOCATION: DPWL ENTOMOLOGY SHOP

IFS FACILITY NUMBER: 01235

FACILITY TYPE: SUPPLY & STORAGE FACILITIES, LOGISTICS

FINDING DESCRIPTION: An unlabeled drum of unidentified waste was stored in the Directorate of Public Works and Logistics (DPWL) Pesticide Storage Bldg# 1235. Entomology personnel had no information on the contents of the drum. The drum had been in storage for more than ten years.

CRITERIA: Installations/CW facilities that generate solid wastes must determine if the wastes are hazardous wastes (40 CFR 261.3, 261.4(b), 261.21 through 261.24, and 262.11) [June 1995].

FINDING COMMENTS:

STATUS OF CORRECTION: INITIATED/WORK REQUEST SUBMITTED

CORRECTIVE ACTION: Test contents of the unlabeled drum for hazardous waste characteristics and manage accordingly. Estimated Cost: \$2,000.

CORRECTIVE ACTION TYPE: OTHERS

COST: 2000

1383 PROJECT NUMBER:

CORRECTIVE ACTION COMMENTS: INSTALLATION COMMENT: Sampling and analysis scheduled for February 1998.

HW.10.1 #5 I FEDERAL CORRECTIVE ACTION Hazardous Waste

FINDING ID: HW-KM-04

MANUAL QUESTION NUMBER: HW-010-001

FINDING CATEGORY: CLASS I

FINDING TYPE: Negative

EXISTING NOV: NO

LOCATION: WBAMC/MATERIALS BRANCH

IFS FACILITY NUMBER: 11156

FACILITY TYPE: HOSPITAL & MEDICAL FACILITIES

TENANT NAME: WILLIAM BEAUMONT AMC

FINDING DESCRIPTION: Hazardous waste was being disposed of improperly. William Beaumont Army Medical Center (WBAMC) returns expired pharmaceuticals to "Easy Returns" for cash credits. These items are either recycled or destroyed. Several expired pharmaceuticals fall under the Resource Conservation and Recovery Act (RCRA) and must be managed as hazardous waste. A hazardous waste manifest was not being completed identifying "Easy Returns" as the waste recipient for those expired items which were hazardous waste.

CRITERIA: Installations/CW facilities that generate solid wastes must determine if the wastes are hazardous wastes (40 CFR 261.3, 261.4(b), 261.21 through 261.24, and 262.11) [June 1995].

FINDING COMMENTS: A list of medical items which are hazardous waste when expired or discarded is being provided to the Material Identification and Examiner Officer.

STATUS OF CORRECTION: INITIATED/WORK REQUEST SUBMITTED

CORRECTIVE ACTION: Determine which pharmaceuticals need to be managed as hazardous waste upon their expiration. Return these items to Easy Return before they expire. If the items have exceeded their holding times, manage and turn them in as hazardous waste. Estimated Cost: Minimal.

CORRECTIVE ACTION TYPE: OPERATIONAL OR PROCEDURAL CHANGE

COST: 0

1383 PROJECT NUMBER:

CORRECTIVE ACTION COMMENTS: INSTALLATION COMMENT: Return hazardous pharmaceuticals to contractor before expiration dates. Manage expired hazardous pharmaceuticals as hazardous waste, including requirements for manifests.

HW.10.1 #6 I FEDERAL CORRECTIVE ACTION

Hazardous Waste

FINDING ID: HW-KM-05

MANUAL QUESTION NUMBER: HW-010-001

FINDING CATEGORY: CLASS I

FINDING TYPE: Negative

EXISTING NOV: NO

LOCATION: DPWL/POWER PLANT

IFS FACILITY NUMBER: 05898

FACILITY TYPE: MAINTENANCE FACILITIES

FINDING DESCRIPTION: There was one full, unlabelled drum located at the DPWL/Power Plant Hazardous Waste Accumulation Point (HWAP). All waste containers should be clearly labeled "Hazardous Waste" or with the contents of the drum.

CRITERIA: Installations/CW facilities that generate solid wastes must determine if the wastes are hazardous wastes (40 CFR 261.3, 261.4(b), 261.21 through 261.24, and 262.11) [June 1995].

FINDING COMMENTS:

STATUS OF CORRECTION: COMPLETE

CORRECTIVE ACTION: Determine the contents of the drum and label the drum accordingly. If the contents of the drum cannot be identified, determine whether or not the drum contents exhibit any characteristic of hazardous waste as detailed under 40 CFR 261.20 and dispose accordingly. Estimated Cost: \$1,500.

CORRECTIVE ACTION TYPE: OTHERS

COST: 1500

1383 PROJECT NUMBER:

CORRECTIVE ACTION COMMENTS: INSTALLATION COMMENT: The drum was marked for contents, as determined by process knowledge. Corrective action completed.

HW.55.5 #1 I FEDERAL CORRECTIVE ACTION Hazardous Waste

FINDING ID: HW-KM-01

MANUAL QUESTION NUMBER: HW-055-005

FINDING CATEGORY: CLASS I

FINDING TYPE: Negative

EXISTING NOV: NO

LOCATION: WBAMC/RADIOLOGY

IFS FACILITY NUMBER: 07777

FACILITY TYPE: HOSPITAL & MEDICAL FACILITIES

TENANT NAME: WILLIAM BEAUMONT AMC

FINDING DESCRIPTION: Hazardous waste manifests maintained in the radiology department were incomplete. The radiology department had contracted R.P. Kincheloe Co. for pickup and disposal of used X-ray fixer in exchange for fresh fixer for all Ft Bliss medical activities. A hazardous waste manifest was filled out during pick-up. However, a signed and dated copy of a completed manifest was not being sent back to Radiology after the used fixer had been delivered to the Treatment, Storage, Disposal Facility (TSDF). The contractor makes one pick-up a week. Only three completed manifests were noted in the 1996 and 1997 files.

CRITERIA: Generators are required to use manifests, file manifest exception reports, and maintain records (40 CFR 262.40(b), 262.40(d), and 262.42(a)).

FINDING COMMENTS: The current person maintaining oversight of the disposal contract was unaware of the requirements for completed manifests to be returned to the generator. Resource Conservation and Recovery Act (RCRA) training on their part would have prevented this finding. By transferring control of the contract over to the Material Identification and Examiner Officer, all hazardous waste disposal will fall under one persons oversight.

STATUS OF CORRECTION: INITIATED/WORK REQUEST SUBMITTED

CORRECTIVE ACTION: Call R.P. Kincheloe for copies of the completed manifests and transfer control and oversight of this contract over to the Material Identification and Examiner Officer. Estimated Cost: Minimal.

CORRECTIVE ACTION TYPE: ADMINISTRATIVE OR POLICY CHANGE

COST: 0

1383 PROJECT NUMBER:

CORRECTIVE ACTION COMMENTS: INSTALLATION COMMENT: Transferred

contract oversight to Material Identifier/Examiner Officer.
Called to obtain copies of manifest. Maintain manifest files in
the future.

HW.70.4 #1 I FEDERAL CORRECTIVE ACTION Hazardous Waste

FINDING ID: HW-KM-02

MANUAL QUESTION NUMBER: HW-070-004

FINDING CATEGORY: CLASS I

FINDING TYPE: Negative

EXISTING NOV: NO

LOCATION: WBAMC/CLINICAL LAB

IFS FACILITY NUMBER: 07777

FACILITY TYPE: HOSPITAL & MEDICAL FACILITIES

TENANT NAME: WILLIAM BEAUMONT AMC

FINDING DESCRIPTION: Waste Acetonitile (ACN) was improperly stored. Waste ACN (approximately 200-300 ml at a time) was placed in an uncovered container and placed in a laboratory fume hood where it was allowed to evaporate to dryness.

CRITERIA: Containers at generators must be closed during storage and handled in a safe manner (40 CFR 262.34(a)(1)(i) and 265.173).

FINDING COMMENTS: By allowing the ACN to evaporate to dryness, the clinical lab is treating a hazardous waste without a permit as described under 40 CFR 262.10.

STATUS OF CORRECTION: COMPLETE

CORRECTIVE ACTION: Collect waste acetonitrile in closed containers then turn it in as hazardous waste. Estimated Cost: Minimal.

CORRECTIVE ACTION TYPE: OPERATIONAL OR PROCEDURAL CHANGE

COST: 0

1383 PROJECT NUMBER:

CORRECTIVE ACTION COMMENTS: INSTALLATION COMMENT: Implementation of corrective action. Written procedure is in effect.

HW.105.1 #1 I FEDERAL CORRECTIVE ACTION Hazardous Waste

FINDING ID: HW-MB-03

MANUAL QUESTION NUMBER: HW-105-001

FINDING CATEGORY: CLASS I

FINDING TYPE: Negative

EXISTING NOV: NO

LOCATION: 41ST EOD

IFS FACILITY NUMBER: 11000

FACILITY TYPE: TRAINING BLDGS, RANGES, COURSES, TROOP OPNS

FINDING DESCRIPTION: The 41st EOD, who operate the permitted Open Detonation Pit at McGregor Range, were not maintaining inspection and training records as required by the Resource Conservation and Recovery Act (RCRA) Part B permit.

CRITERIA: All permitted TSDFs are required to meet the hazardous waste management requirements outlined in their permit (40 CFR 270.10 and 270.30 through 270.33). This includes maintaining inspection and training records in accordance with 40 CFR 264.15 & .16.

FINDING COMMENTS:

STATUS OF CORRECTION: CONSTRUCTION/IMPLEMENTATION OF CORRECTIVE ACTION

CORRECTIVE ACTION: Establish recordkeeping practices with the assistance of the Directorate of Environment (DOE). Estimated Cost: Minimal.

CORRECTIVE ACTION TYPE: ADMINISTRATIVE OR POLICY CHANGE

COST: 0

1383 PROJECT NUMBER:

CORRECTIVE ACTION COMMENTS: INSTALLATION COMMENT: Implementing corrective action.

NATURAL RESOURCES PROGRAM

The Natural Resources program at Fort Bliss is much improved since the previous Environmental Compliance Assessment System (ECAS). While findings were noted for a lack of approved Endangered Species Management Plans (ESMP) and the Integrated Natural Resources Management Plan (INRMP), it was noted that these plans are on schedule for completion in the near future. Overall, a positive finding was recorded for the Natural Resources program. This positive finding highlights the exceptional work generated with the Geographic Information System (GIS) and satellite imagery, the work being conducted by the Integrated Training Area Management (ITAM) program, and the exceptional and highly trained natural resources staff.

NR.1.3.A #1 III ARMY/DOD CORRECTIVE ACTION Natural Resource

FINDING ID: NR-TS-02

MANUAL QUESTION NUMBER: NR-001-003-A

FINDING CATEGORY: CLASS III

FINDING TYPE: Negative

EXISTING NOV: NO

LOCATION: DOE

IFS FACILITY NUMBER: 00624

FACILITY TYPE: TRAINING BLDGS, RANGES, COURSES, TROOP OPNS

FINDING DESCRIPTION: The Integrated Natural Resources Management Plan (INRMP) had not yet been completed for Fort Bliss. This plan needs to address specific natural resources management issues as outlined by Army Regulation and the recently reauthorized Sikes Act. A draft INRMP has been prepared and needs to be finalized.

CRITERIA: Installations meeting size and natural resource base requirements are required to have an INRMP that meets specific criteria (AR 200-3, para 2-2a and Chapter 9 and DODI 4715.3, para D2(b), D2(h) and Enclosure 7) [December 1996]. The recently reauthorized Sikes Act (PL 105-85) requires preparation and implementation of an INRMP.

FINDING COMMENTS: It should be noted that the INRMP, as a component plan of the Master Plan and associated Environmental Impact Statement (EIS, under preparation, see finding 01-TS-04), must be completed and available for public review by the end of this fiscal year to accommodate the schedule for the Master Plan EIS. It should also be noted that MACOM environmental "must fund" project requirements outlined in the five-year INRMP must reflect MACOM policy for approval. INRMP costs have been previously provided through the Environmental Program Review (EPR) process.

STATUS OF CORRECTION: INITIATED/WORK REQUEST SUBMITTED

CORRECTIVE ACTION: Complete INRMP in accordance with reauthorized Sikes Act requirements. Plan will require approval by Major Command (MACOM). Estimated Cost: minimal.

CORRECTIVE ACTION TYPE: ADMINISTRATIVE OR POLICY CHANGE

COST: 0

1383 PROJECT NUMBER:

CORRECTIVE ACTION COMMENTS: INSTALLATION COMMENT: The mission and Master Plan EIS including the INRMP will be finalized by August 1998.

TRADOC COMMENT: Recommend adding the following statement: "DA policy regarding description of projects required for the INRMP implementation is in flux. Subsequently, requested INRMP projects will likely be excessive and will require close coordination with the MACOM."

NR.1.12.A #1 III ARMY/DOD CORRECTIVE ACTION Natural Resource

FINDING ID: NR-TS-01

MANUAL QUESTION NUMBER: NR-001-012-A

FINDING CATEGORY: CLASS III

FINDING TYPE: Negative

EXISTING NOV: NO

LOCATION: DOE

IFS FACILITY NUMBER: 00624

FACILITY TYPE: TRAINING BLDGS, RANGES, COURSES, TROOP OPNS

FINDING DESCRIPTION: Cooperative plans between Fort Bliss, US Fish and Wildlife Service, and the State agencies of Texas and New Mexico charged with management of fish and wildlife resources had never been finalized. Prior attempts to enter into cooperative agreements were not approved at the Major Command (MACOM) level due to specific project commitments. However, cooperative plans do not require specific project commitments, only an agreement between installation and agencies regarding a program of planning for, and the development, maintenance, and coordination of wildlife, fish and game conservation.

CRITERIA: Cooperative agreements entered into with other entities to provide for the maintenance and improvement of natural resources must contain specific language (DODI 4715.3, para F1(e)) [December 1996]. AR 200-3, para 6-4 requires a Fish and Wildlife Cooperative plan, as authorized by the Sikes Act (16 USC 670a).

FINDING COMMENTS: Recent reauthorization of the Sikes Act will now require the INRMP to represent the cooperative plan.

STATUS OF CORRECTION: INITIATED/WORK REQUEST SUBMITTED

CORRECTIVE ACTION: Recent passage of the Sikes Act eliminates need for cooperative plan in lieu of preparing and implementing an Integrated Natural Resource Management Plan (INRMP, see finding NR-TS-02). No corrective action or cost is associated with this finding.

CORRECTIVE ACTION TYPE: ADMINISTRATIVE OR POLICY CHANGE

COST: 0

1383 PROJECT NUMBER:

CORRECTIVE ACTION COMMENTS: INSTALLATION COMMENT: The mission and Master Plan EIS including the INRMP will be finalized by August 1998.

NR.20.2.A #1 III ARMY/DOD CORRECTIVE ACTION Natural Resource

FINDING ID: NR-TS-03

MANUAL QUESTION NUMBER: NR-020-002-A

FINDING CATEGORY: CLASS III

FINDING TYPE: Negative

EXISTING NOV: NO

LOCATION: DOE

IFS FACILITY NUMBER: 00624

FACILITY TYPE: TRAINING BLDGS, RANGES, COURSES, TROOP OPNS

FINDING DESCRIPTION: Endangered Species Management Plans (ESOPs) had not been finalized for several federally listed species found on Fort Bliss. Army Regulation requires ESOPs to be completed and approved by the Installation Commander within one year of discovery. National Environmental Policy Act (NEPA) evaluation is required to implement ESOPs, ideally incorporated within the Master Plan Environmental Impact Statement process.

CRITERIA: Installations are required to produce Endangered Species Management Plans (ESOPs) for listed and proposed species and critical habitat present on the installation (AR 200-3, para 11-5, 11-6f) [February 1996].

FINDING COMMENTS: As with Integrated Natural Resources Management Plan, ESOPs must be completed concurrent with scheduled completion of the Master Plan Environmental Impact Statement prior to the end of this fiscal year. Scheduled completion and approval of ESOPs is February 98. Funding had been previously provided from the Major Command (MACOM) to complete ESOPs. If subsequent informal consultation with the Fish and Wildlife Service (FWS) results in a "may affect" determination, a Biological Assessment and formal consultation with FWS will be required.

STATUS OF CORRECTION: CONSTRUCTION/IMPLEMENTATION OF CORRECTIVE ACTION

CORRECTIVE ACTION: Finalize ESOPs for installation commander approval. Estimated Cost: minimal.

CORRECTIVE ACTION TYPE: ADMINISTRATIVE OR POLICY CHANGE

COST: 0

1383 PROJECT NUMBER:

CORRECTIVE ACTION COMMENTS: INSTALLATION COMMENT: Corrective action implemented. Very near completion.

NR.1.7.A #1 POSITIVE ARMY/DOD CORRECTIVE ACTION Natural Resource

FINDING ID: NR-TS-04

MANUAL QUESTION NUMBER: NR-001-007-A

FINDING CATEGORY: POSITIVE

FINDING TYPE: Positive

EXISTING NOV: NO

LOCATION: DOE

IFS FACILITY NUMBER: 00624

FACILITY TYPE: TRAINING BLDGS, RANGES, COURSES, TROOP OPNS

FINDING DESCRIPTION: The Natural Resources Management Program is much improved since the previous Environmental Compliance Assessment System (ECAS) and worthy of a positive finding. Noteworthy items identified during this assessment included exceptional use of Geographic Information System and satellite imagery technology, and use of some innovative land rehabilitation techniques as part of the Integrated Training Area Management (ITAM) program. The exceptional Natural Resources Staff assembled since the previous ECAS have done much to advance this program resulting in an overall positive finding.

CRITERIA: Personnel assigned duties in natural resources are required to have the appropriate knowledge, skills, professional training, and education to carry out their responsibilities (DODI, 4715.3, para D1(j)) [December 1996].

FINDING COMMENTS:

STATUS OF CORRECTION:

CORRECTIVE ACTION:

CORRECTIVE ACTION TYPE: TRAINING

COST: 0

1383 PROJECT NUMBER:

CORRECTIVE ACTION COMMENTS: Positive finding. No corrective action needed.

ENVIRONMENTAL IMPACTS

The National Environmental Policy Act (NEPA) program at Fort Bliss, though improved from the last Environmental Compliance Assessment System (ECAS) is still in need of some significant improvement. Many more projects are now reviewed in accordance with NEPA compared with past years. This has been facilitated by designating a single NEPA coordinator. However, it was clear during this assessment that required NEPA analysis is often neglected. This appears to be in part due to a lack of clear guidance from the Directorate of Environment to activities that review projects and work orders. It was noted that 131 projects reviewed in 1997 represented a relatively low number of projects considering the size and scope of activities at Fort Bliss. Another concern was that five of the six NEPA findings identified were repeats from the previous ECAS. In addition to a Class 1 finding for projects lacking review IAW NEPA, two Class 2 findings were noted for a lack of a program to track mitigation commitments and to highlight the importance of completing the Master Plan Environmental Impact Statement (EIS) prior to completion of the McGregor Range Withdrawal EIS. Finally, Class 3 findings were noted for the need for formal NEPA training, incomplete NEPA documentation in files, and for improper signatures on NEPA documentation.

01.5.1 #1 I FEDERAL CORRECTIVE ACTION

Environmental Impacts

FINDING ID: 01-TS-03

MANUAL QUESTION NUMBER: 01-005-001

FINDING CATEGORY: CLASS I

FINDING TYPE: Negative

EXISTING NOV: NO

LOCATION: DOE

IFS FACILITY NUMBER: 00624

FACILITY TYPE: TRAINING BLDGS, RANGES, COURSES, TROOP OPNS

FINDING DESCRIPTION: Despite commendable efforts by the environmental staff to fully evaluate all actions in accordance with National Environmental Policy Act (NEPA), some projects still proceed unreported or inadequately reported to Directorate of Environment(DOE) personnel. Recent examples include the Tobin Wells expansion of missile lanes 6 and 7, the landscaping project around historic Building #1, and a variety of other projects concerning historic structures.

CRITERIA: The NEPA process must be integrated into planning for projects at the installation/CW facility as early as possible in order to prevent delays in project implementation (40 CFR 1501.1 and 1501.2).

FINDING COMMENTS: It was noted that only 131 projects had been reviewed for NEPA compliance during the current calendar year (through 11 Dec), with approximately half of these requiring a Record of Environmental Consideration (REC). This represented approximately 1/4 of the RECs this reviewer has typically seen at other installations, all considerably smaller than Fort Bliss. It appears as if DOE personnel have often received inadequate information (work orders) from Directorate of Public Works and/or Contracting personnel. There has historically been a lack of clear guidance from DOE on the types of projects that require review. Though historically a non-litigious environment, there was some concern regarding the presence in the region of some environmental groups that may focus on Fort Bliss activities. Fort Huachuca had become one of those foci, at considerable cost and manpower.

STATUS OF CORRECTION: INITIATED/WORK REQUEST SUBMITTED

CORRECTIVE ACTION: Increase awareness of activities at Fort Bliss on the necessity/need to inform DOE early in planning processes of proposed projects. Provide clear guidance on the types of projects that require review. Estimated Cost: minimal.

CORRECTIVE ACTION TYPE: TRAINING

COST: 0

1383 PROJECT NUMBER:

CORRECTIVE ACTION COMMENTS: INSTALLATION COMMENT: Agree. DPWL agreed to provide DOE all project lists and subsequent work orders. DOE will implement an installation-wide training program to supplement the NEPA SOP.

01.5.3 #1 II FEDERAL CORRECTIVE ACTION Environmental Impacts

FINDING ID: 01-TS-04

MANUAL QUESTION NUMBER: 01-005-003

FINDING CATEGORY: CLASS II

FINDING TYPE: Negative

EXISTING NOV: NO

LOCATION: DOE

IFS FACILITY NUMBER: 00624

FACILITY TYPE: TRAINING BLDGS, RANGES, COURSES, TROOP OPNS

FINDING DESCRIPTION: The Fort Bliss Ongoing Mission and Master Plan (MP) Environmental Impact Statement (EIS) had not been completed. The previous EIS from 1984 is inadequate.

CRITERIA: An installation/CW facility must produce an EIS if certain conditions exist due to a proposed action (40 CFR 1501.4(a), 1501.4(c), and 1502.4).

FINDING COMMENTS: It is essential this MP EIS be completed on schedule with the McGregor Range Withdrawl EIS which is scheduled for review in late calendar year 1998.

STATUS OF CORRECTION: CONSTRUCTION/IMPLEMENTATION OF CORRECTIVE ACTION

CORRECTIVE ACTION: Complete EIS on schedule. Since project previously funded, Estimated Cost: minimal.

CORRECTIVE ACTION TYPE: OTHERS

COST: 0

1383 PROJECT NUMBER:

CORRECTIVE ACTION COMMENTS: INSTALLATION COMMENT: Agree. In progress and on schedule.

01.5.12.A #1 II FEDERAL CORRECTIVE ACTION Environmental Impacts

FINDING ID: 01-TS-01

MANUAL QUESTION NUMBER: 01-005-012-A

FINDING CATEGORY: CLASS II

FINDING TYPE: Negative

EXISTING NOV: NO

LOCATION: DOE

IFS FACILITY NUMBER: 00624

FACILITY TYPE: TRAINING BLDGS, RANGES, COURSES, TROOP OPNS

FINDING DESCRIPTION: No formal system had been established at Fort Bliss to track mitigation requirements outlined in National Environmental Policy Act (NEPA) documentation. NEPA-committed mitigation represents a legal requirement that must be tracked to ensure compliance.

CRITERIA: Installations are required to implement mitigation and/or other considerations established in the Environmental Assessment (EA) or Finding of No Significant Impact (FNSI, AR 200-2, para 2-7a and para 2-7d).

FINDING COMMENTS: While only minor projects have required monitoring since the last Environmental Compliance Assessment System (ECAS), this finding is of particular importance with the significant Environmental Impact Statements (Master Plan and McGregor Withdrawal) due out within fiscal year 98.

STATUS OF CORRECTION: COMPLETE

CORRECTIVE ACTION: Establish a formal procedure to ensure that committed mitigation measures are completed. NEPA coordinator must outline past and future committed requirements and schedule compliance assessments for projects. Project design checks will facilitate ensurance of mitigation compliance. Estimated Cost: minimal.

CORRECTIVE ACTION TYPE: ADMINISTRATIVE OR POLICY CHANGE

COST: 0

1383 PROJECT NUMBER:

CORRECTIVE ACTION COMMENTS: INSTALLATION COMMENT: The database for tracking mitigation measures is operational. The database includes mitigation required for all EA's during the past 5 years, as well as 1997 CX/REC's. NEPA standard operating procedures revised to address mitigation tracking. Corrective action completed.

01.1.2.A #1 III ARMY/DOD CORRECTIVE ACTION Environmental Impacts

FINDING ID: 01-TS-02

MANUAL QUESTION NUMBER: 01-001-002-A

FINDING CATEGORY: CLASS III

FINDING TYPE: Negative

EXISTING NOV: NO

LOCATION: DOE

IFS FACILITY NUMBER: 00624

FACILITY TYPE: TRAINING BLDGS, RANGES, COURSES, TROOP OPNS

FINDING DESCRIPTION: The Fort Bliss National Environmental Policy Act (NEPA) Coordinator had not participated in a formal NEPA training course. Formal training will facilitate implementation of the NEPA program and ensure compliance.

CRITERIA: Management and organization of paperwork, materials, and personnel should be done in a manner that prevents noncompliance and recurrence of noncompliance, precludes/minimizes regulatory enforcement actions (including warning letters etc.) promotes good public relations, and addresses systemic weaknesses in the overall operation of the program (MP).

FINDING COMMENTS: The number of significant NEPA actions currently ongoing highlights the importance of ensuring the NEPA coordinator is highly trained in current methodologies.

STATUS OF CORRECTION: CONSTRUCTION/IMPLEMENTATION OF CORRECTIVE ACTION

CORRECTIVE ACTION: Have NEPA coordinator and other environmental staff, as required, attend weeklong NEPA class and periodic NEPA seminars. Estimated Cost: \$10,000 per individual.

CORRECTIVE ACTION TYPE: TRAINING

COST: 10000

1383 PROJECT NUMBER:

CORRECTIVE ACTION COMMENTS: INSTALLATION COMMENT: Agree. In progress.

01.5.8.A #1 III ARMY/DOD CORRECTIVE ACTION Environmental Impacts

FINDING ID: 01-TS-06

MANUAL QUESTION NUMBER: 01-005-008-A

FINDING CATEGORY: CLASS III

FINDING TYPE: Negative

EXISTING NOV: NO

LOCATION: DOE

IFS FACILITY NUMBER: 00624

FACILITY TYPE: TRAINING BLDGS, RANGES, COURSES, TROOP OPNS

FINDING DESCRIPTION: Recent National Environmental Policy Act (NEPA) documentation including Environmental Assessments (EAs) and associated Findings of No Significant Impact (FNSIs) have been signed by the Environmental Chief. Signatory authority is the responsibility of the installation commander.

CRITERIA: The EA, the FNSI, and all other appropriate planning documents will be provided to the appropriate decision-maker for review and consideration. The signature page for the EA and the FNSI package will be signed by the appropriate decision-maker to indicate his or her review and approval (AR 200-2, para 5-4b). This policy has been clarified through memoranda from HQDA (20 Dec 91) and endorsed by HQ TRADOC (14 Feb 92).

FINDING COMMENTS:

STATUS OF CORRECTION: COMPLETE

CORRECTIVE ACTION: All future EAs, Environmental Impact Statements (EISs), and FNSIs require the installation commander's signature as the approver or joint approver. Estimated Cost: minimal.

CORRECTIVE ACTION TYPE: ADMINISTRATIVE OR POLICY CHANGE

COST: 0

1383 PROJECT NUMBER:

CORRECTIVE ACTION COMMENTS: INSTALLATION COMMENT: Proponents of current EA's were notified regarding Commander's signature. All future EA's, EIS's, and FONSIs will be signed by the Installation Commander. Corrective action completed.

01.5.16.A #1 III ARMY/DOD CORRECTIVE ACTION Environmental Impacts

FINDING ID: 01-TS-05

MANUAL QUESTION NUMBER: 01-005-016-A

FINDING CATEGORY: CLASS III

FINDING TYPE: Negative

EXISTING NOV: NO

LOCATION: DOE

IFS FACILITY NUMBER: 00624

FACILITY TYPE: TRAINING BLDGS, RANGES, COURSES, TROOP OPNS

FINDING DESCRIPTION: Environmental Assessment (EA) files reviewed since the previous ECAS were incomplete in a number of areas. Specifically, no formal affidavits of publication were contained in any files, in one instance no copy of the Notice of Availability (NOA) was found (Loop 375 EA), and one file contained the public notice with no indication of the date of publication or the newspaper (Hazmart EA). Also, some files lacked signed copies of the EA and associated Finding of No Significant Impact (FNSI, Paladin EA, Loop 375 EA, Site 10 Road EA).

CRITERIA: Specific records must be maintained in certain circumstances (AR 200-2, para 3-1).

FINDING COMMENTS:

STATUS OF CORRECTION: COMPLETE

CORRECTIVE ACTION: Maintain complete administrative records for future actions. Request formal affidavits of publication of FNSI documentation from newspapers. Maintain original signed copies of all NEPA documentation in files. Estimated Cost: minimal.

CORRECTIVE ACTION TYPE: OPERATIONAL OR PROCEDURAL CHANGE

COST: 0

1383 PROJECT NUMBER:

CORRECTIVE ACTION COMMENTS: INSTALLATION COMMENT: Ensure that future NEPA files are complete. Corrective action completed.

ENVIRONMENTAL NOISE

The four negative and one positive findings are a clear indication of the need to improve the Fort Bliss Environmental Noise Program. The Fort Bliss Draft Environmental Noise Management Plan is incomplete and missing critical environmental noise contours for current and future operations. The Biggs Army Airfield needs to maintain operational data for aircraft operations to develop environmental; noise contours. The lack of an adequate Environmental Noise Program does not result in civil/criminal penalties, however, it can create situations that reduce and impact the installations operational capabilities. These reductions in operations are a direct result of public and political pressures to reduce the installations noise producing operations.

O2.1.3.A #1 III ARMY/DOD CORRECTIVE ACTION Environmental Noise

FINDING ID: O2-DB-004

MANUAL QUESTION NUMBER: O2-001-003-A

FINDING CATEGORY: CLASS III

FINDING TYPE: Negative

EXISTING NOV: NO

LOCATION: DOE

IFS FACILITY NUMBER: 00515

FACILITY TYPE: TRAINING BLDGS, RANGES, COURSES, TROOP OPNS

FINDING DESCRIPTION: The current Fort Bliss Environmental Noise Management Plan (ENMP), (October 1997), was in draft and should be finalized. The environmental noise contours for Biggs Army Airfield (BAAF) and Fort Bliss ranges need to be updated to reflect current and future operations at these facilities. Fort Bliss needs to include these updated environmental noise contours for BAAF and range operations in the Environmental Noise Management Plan (ENMP). Any future activities that may affect the noise environment, including the Joint Use BAAF and El Paso International Airport proposal must also be addressed. These types of noise generating proposals can have long term significant impacts on both civilian and Fort Bliss land use planning.

CRITERIA: Installations are required to continually evaluate the impact of noise that may be produced by ongoing and proposed Army actions/activities (AR 200-1, para 7-2c, 7-2d, 7-5a) [January 1997].

FINDING COMMENTS: Although the environmental noise impact of Fort Bliss is not creating a significant problem today, this can change with future changes in land use or missions (i.e., the proposed joint use of BAAF). The primary purpose of the ENMP is to identify existing land use incompatibilities and prevent conflicts, both on-post and off-post.

STATUS OF CORRECTION: NO ACTION YET

CORRECTIVE ACTION: Update the ENMP to include current and future mission changes and proposals. Estimated cost is \$7,000.

CORRECTIVE ACTION TYPE: OTHERS

COST: 7000

1383 PROJECT NUMBER:

CORRECTIVE ACTION COMMENTS: INSTALLATION COMMENT: If year-end funds are available to update the ENMP.

TRADOC COMMENT: The root cause identified a potential serious problem in the Fort Bliss environmental program. Contract oversight to ensure the government receives the product from the contract is a critical element.

O2.1.7.A #1 III ARMY/DOD CORRECTIVE ACTION Environmental Noise

FINDING ID: O2-DB-003

MANUAL QUESTION NUMBER: O2-001-007-A

FINDING CATEGORY: CLASS III

FINDING TYPE: Negative

EXISTING NOV: NO

LOCATION: AVIATION DIV

IFS FACILITY NUMBER: 11210

FACILITY TYPE: TRAINING BLDGS, RANGES, COURSES, TROOP OPNS

FINDING DESCRIPTION: Although Biggs Army Airfield (BAAF) was maintaining some operational data, it was not adequate to produce environmental noise contours. These data, listed in Army Regulation (AR) 200-1, para 7-5f, includes flight track locations, altitudes along the flight tracks, arrival and departure patterns, specific type of aircraft (e.g., UH-60, CH-53, UH-1, C-130, C-5A, etc.) and the number of daytime and nighttime operations by aircraft type along each flight track.

CRITERIA: Installations are required to maintain operational data on noise producing activities (AR 200-1, para 7-5f).

FINDING COMMENTS: Accurate environmental noise contours cannot be generated using the data currently collected. Without environmental noise contours to support the ENMP, land uses around the airfield will continue to become incompatible with the noise environment.

STATUS OF CORRECTION: NO ACTION YET

CORRECTIVE ACTION: The required operational data should be collected and maintained so that accurate environmental noise contours can be generated for BAAF. The environmental noise contours for BAAF should be incorporated into the Fort Bliss Environmental Noise Management Plan (ENMP) and Installation Master Plan. Estimated Cost: \$ minimal.

CORRECTIVE ACTION TYPE: OPERATIONAL OR PROCEDURAL CHANGE

COST: 0

1383 PROJECT NUMBER:

CORRECTIVE ACTION COMMENTS: TRADOC COMMENT: The root cause for this finding does not correspond with the suggested corrective action. Training does not seem to the issue but lack of an SOP or checklist for airfield personnel to guide collection of operational data.

O2.1.10.A #1 III ARMY/DOD CORRECTIVE ACTION Environmental Noise

FINDING ID: O2-DB-005

MANUAL QUESTION NUMBER: O2-001-010-A

FINDING CATEGORY: CLASS III

FINDING TYPE: Negative

EXISTING NOV: NO

LOCATION: PUBLIC AFFAIRS OFFICE

IFS FACILITY NUMBER: 00015

FACILITY TYPE: ADMINISTRATIVE, COMMUNICATION FACILITIES

FINDING DESCRIPTION: Fort Bliss has an informal noise complaint procedure that should channel all noise complaints to the Public Affairs Office (PAO). However, not all noise complaints that are received at Biggs Army Airfield and Range Control are referred to the PAO. The PAO does investigate each complaint to establish cause, notifies responsible activities and responds back to the complainant. Copies of the noise complaints should be provided to the installation environmental noise committee for review or recurring noise complaints.

CRITERIA: Installations must institute a noise complaint procedure (AR 200-1, para 7-2f) [January 1997].

FINDING COMMENTS: Army Regulation 200-1 designates the PAO as the preferred Point of Contact for all noise complaints. Noise complaints that are received by Fort Bliss should be referred to the PAO.

STATUS OF CORRECTION: INITIATED/WORK REQUEST SUBMITTED

CORRECTIVE ACTION: Develop a written Fort Bliss regulation/Standard Operating Procedure that outlines the goals and responsibilities of managing noise complaints and provides guidance for logging, investigating, and responding to noise complaints. This management would include possible mitigation of the noise sources. Estimated Cost: \$ minimal.

CORRECTIVE ACTION TYPE: OPERATIONAL OR PROCEDURAL CHANGE

COST: 0

1383 PROJECT NUMBER:

CORRECTIVE ACTION COMMENTS: INSTALLATION COMMENT: In progress.

O2.2.1.A #1 III ARMY/DOD CORRECTIVE ACTION Environmental Noise

FINDING ID: O2-DB-001

MANUAL QUESTION NUMBER: O2-002-001-A

FINDING CATEGORY: CLASS III

FINDING TYPE: Negative

EXISTING NOV: NO

LOCATION: DPTMS

IFS FACILITY NUMBER: INST

FACILITY TYPE: TRAINING BLDGS, RANGES, COURSES, TROOP OPNS

FINDING DESCRIPTION: Personnel associated with the Environmental Noise Program have not been trained in environmental noise abatement and management. Personnel within the Environmental Noise Program should be trained to have a basic understanding of environmental noise and the Army's noise program.

CRITERIA: Management of paperwork, materials and personnel should be done in a manner that prevents noncompliance, recurrence of noncompliance and that precludes Notices of Violation (NOV's), letters of citation, promotes good public relations and addresses systemic weaknesses in the overall operation of the program (MP).

FINDING COMMENTS: Attendees for training should include Environmental, Public Affairs Office, Biggs Army Airfield and Range Control operations, Master Planning, and Staff Judge Advocate personnel.

STATUS OF CORRECTION: NO ACTION YET

CORRECTIVE ACTION: Environmental noise training should be provided to all personnel associated with environmental noise management. Fort Bliss should request HQ TRADOC to sponsor a TRADOC environmental noise workshop. The cost of this training, would be related to number of personnel trained and TDY costs. The estimate should be based on 6 personnel at 5 days TDY (airfare and per diem). Estimated Cost: \$6,000.

CORRECTIVE ACTION TYPE: TRAINING

COST: 6000

1383 PROJECT NUMBER:

CORRECTIVE ACTION COMMENTS: INSTALLATION COMMENT: DOE does not have funds to provide noise training.

TRADOC COMMENT: The finding description section does not address the specific issue where the Fort Bliss Noise Program is not being managed properly to preclude non-compliance. The criteria section does not specify a requirement for training of personnel.

Recommend deletion of finding. The recommendation for HQ TRADOC to sponsor a TRADOC environmental noise workshop is inappropriate and has no relationship to the finding.

O2.1.7.A #1 POSITIVE ARMY/DOD CORRECTIVE ACTION Environmental
Noise

FINDING ID: O2-DB-002

MANUAL QUESTION NUMBER: O2-001-007-A

FINDING CATEGORY: POSITIVE

FINDING TYPE: Positive

EXISTING NOV: NO

LOCATION: 1ST CAS BN

IFS FACILITY NUMBER: 09501

FACILITY TYPE: TRAINING BLDGS, RANGES, COURSES, TROOP OPNS

FINDING DESCRIPTION: The Range Control Office collected and maintained firing range operational data in an organized, comprehensive and "State of the Art" manner. These detailed operational data allowed for the generation of accurate environmental noise contours for the Fort Bliss ranges.

CRITERIA: Installations are required to maintain operational data on noise producing activities (AR 200-1, para 7-5f).

FINDING COMMENTS: The data collection model used by Range Control collected and maintained all the data required to generate environmental noise contours for the ranges. This model should be shared with other installations so that they can collect the required data needed to improve the accuracy of the environmental noise contours.

STATUS OF CORRECTION:

CORRECTIVE ACTION: Continue to collect and maintain the operational data.

CORRECTIVE ACTION TYPE:

COST: 0

1383 PROJECT NUMBER:

CORRECTIVE ACTION COMMENTS: Positive finding.

Installation Restoration Program

The assessment of the Installation Restoration Program (IRP) involved the review of the Installation Action Plan (IAP), Cost To Complete, Environmental Program Review (EPR), and Defense Sites Environmental Restoration Tracking System (DSERTS). Data integration problems had been identified previously by TRADOC as being systemic. Therefore, it was an area of considerable focus. Site visits were conducted for several sites where current investigation cleanup efforts had been underway. A line item review was conducted for work completed and works scheduled for this year. The status of current funding was reviewed and assistance was given in development of an installation based IRP Master work plan.

Two IRP ECAS findings were developed. The first identified a lack of adequate access control at IRP sites. The second recognized partnering efforts with state regulators, public, and the Corps of Engineers.

The Fort Bliss IRP has much improved over the last couple of years and was in fairly good shape overall. Continued emphasis on partnering efforts is crucial to the success of the program. Also, there was a need for development of installation standards in addressing the various sites and activities.

03.1.6 #1 III FEDERAL CORRECTIVE ACTION IRP

FINDING ID: 03-JG-01

MANUAL QUESTION NUMBER: 03-001-006

FINDING CATEGORY: CLASS III

FINDING TYPE: Negative

EXISTING NOV: NO

LOCATION: DOE

IFS FACILITY NUMBER: MULT

FACILITY TYPE: TRAINING BLDGS, RANGES, COURSES, TROOP OPNS

FINDING DESCRIPTION: Several sites tracked under the Army Installation Restoration Program (IRP) lack sufficient signage or other institutional controls to deter unauthorized access. Approximately 43 IRP sites are located in areas that are unsecured. Some of these sites contain surface contaminants which may be harmful to humans. Affected sites include sites tracked under the Defense Site Environmental Restoration Tracking System (DSERTS). DSERTS site numbers include: FTBL-001 through FTBL-016, FTBL-021,022,023,028-037,043,044,045,047,049,051, FTBL-070 to 073, 075,and FTBL-078 to through FTBL-080.

CRITERIA: When a Remedial Investigation/Feasibility Study (RI/FS) is done to assess site conditions and evaluate alternatives, specific tasks are required as a part of the RI/FS (40 CFR 300.430 (a)(2)) [May 1996]. ["Treatment of the principal threats posed by a site, with priority placed on treating waste that is liquid, highly toxic or mobile, will be combined with engineering controls as appropriate for treatment of residuals and untreated waste (40 CFR 300.430.a.iii.c)]

FINDING COMMENTS:

STATUS OF CORRECTION: INITIATED/WORK REQUEST SUBMITTED

CORRECTIVE ACTION: Complete review of all IRP sites. Estimated Cost: Minimal cost. Sites with potential public access should have appropriate signage placed around the perimeter to control access. Estimated Cost: \$100/sign. Sites thought to have hazardous contaminants present at or near the surface need to have security measures implemented. Erection of access gates or fencing may be warranted. Estimated Cost: Less than \$100,000.

CORRECTIVE ACTION TYPE: OTHERS

COST: 101000

1383 PROJECT NUMBER:

CORRECTIVE ACTION COMMENTS: INSTALLATION COMMENT: DOE requested funds from the DERP to complete the corrective action.

O3.1.2.A #1 POSITIVE ARMY/DOD CORRECTIVE ACTION IRP

FINDING ID: O3-JG-02

MANUAL QUESTION NUMBER: O3-001-002-A

FINDING CATEGORY: POSITIVE

FINDING TYPE: Positive

EXISTING NOV: NO

LOCATION: DOE

IFS FACILITY NUMBER: 00624

FACILITY TYPE: TRAINING BLDGS, RANGES, COURSES, TROOP OPNS

FINDING DESCRIPTION: Fort Bliss has established a Restoration Advisory Board (RAB) and has now formally introduced public participation into its decision making process regarding the Installation Restoration Program (IRP). The RAB has representation from both Texas and New Mexico and meets quarterly to discuss cleanup issues. Additionally, Fort Bliss IRP program manager has recently developed a Memorandum of Agreement between Fort Bliss and the Fort Worth District to clarify roles and responsibilities. This is a big improvement over past years when communication and coordination was very poor.

CRITERIA: Management and organization of paperwork, materials, and personnel should be done in a manner that prevents noncompliance and recurrence of noncompliance, precludes/minimizes regulatory enforcement actions (including warning letters etc.) promotes good public relations, and addresses systemic weaknesses in the overall operation of the program (MP).

FINDING COMMENTS:

STATUS OF CORRECTION:

CORRECTIVE ACTION: Continue partnering efforts with the State of Texas and New Mexico to build a closer relationship. Continue to build upon the much improved relationship with the Fort Worth District COE in developing and maintaining Fort Bliss short range and long range cleanup plans. Estimated Cost: Minimal

CORRECTIVE ACTION TYPE:

COST: 0

1383 PROJECT NUMBER:

CORRECTIVE ACTION COMMENTS: Positive finding.

Pollution Prevention Summary

Fort Bliss has an active pollution prevention (P2) program that has implemented several proactive pollution prevention projects to include the development of a centralized hazardous material control center scheduled to open on February 3, 1999. Fort Bliss is currently reevaluating their P2 program and has contracted to have their current pollution prevention plan incorporated into an Integrated Pollution Prevention Plan. The development of a comprehensive plan is a bold initiative that will give Fort Bliss's pollution prevention program a prioritized implementation plan for waste prevention and reductions. When complete this plan will produce a multi-media integrated action plan for the following media areas: ozone depleting chemicals, hazardous material use/reduction, hazardous waste disposal, municipal solid waste management, potable water conservation, affirmative procurement, and recycling opportunities.

The one deficiency identified in the pollution prevention program was the lack of an installation wide affirmative procurement program that would assure the purchasing of EPA guideline items containing recycled content materials. The proponent for this program should be the Director of Contracting with technical support provided by DOE.

04.1.15.A #1 III ARMY/DOD CORRECTIVE ACTION Pollution Prevention

FINDING ID: O4-PA-02

MANUAL QUESTION NUMBER: O4-001-015-A

FINDING CATEGORY: CLASS III

FINDING TYPE: Negative

EXISTING NOV: NO

LOCATION: INST

IFS FACILITY NUMBER: INST

FACILITY TYPE: MAINTENANCE FACILITIES

FINDING DESCRIPTION: Used oil filters are not being crushed and recycled as scrap metal.

CRITERIA: Pollution prevention will occur at installations through prevention, reduction, reuse, and treatment (AR 200-1, para 4-2c, 4-2d, and 102c) [January 1997].

FINDING COMMENTS: Oil filter crushers have been successfully implemented at many Army installations. This action will reduce compliance liability for improper draining of oil filters at motorpool operations.

STATUS OF CORRECTION: NO ACTION YET

CORRECTIVE ACTION: Fort Bliss should purchase automotive oil filter crushers for all motorpools. These filter crushers will ensure that all free liquid is removed from each filter so they can be recycled as scrap metal. Estimated Cost: \$200 to \$500 per filter crusher (Approximately 20 units would be required)

CORRECTIVE ACTION TYPE: EQUIPMENT PROCUREMENT OR CHANGE

COST: 10000

1383 PROJECT NUMBER:

CORRECTIVE ACTION COMMENTS: INSTALLATION COMMENT: DOE will submit an A106 funding request in the spring of 1998.

O4.5.1.A #1 III FEDERAL CORRECTIVE ACTION Pollution Prevention

FINDING ID: O4-PA-01

MANUAL QUESTION NUMBER: O4-005-001-A

FINDING CATEGORY: CLASS III

FINDING TYPE: Negative

EXISTING NOV: NO

LOCATION: DOC

IFS FACILITY NUMBER: INST

FACILITY TYPE: ADMINISTRATIVE, COMMUNICATION FACILITIES

FINDING DESCRIPTION: Fort Bliss procurement process did not have a system to identify and purchase products made from recycled materials.

CRITERIA: Certain procured products must be made from recovered solid waste (RCRA Section 6002, 40 CFR 248 through 253).

FINDING COMMENTS: The General Service Authority has updated it's recycled products catalog. The quality of products have been upgraded for use in standard printing and copying equipment. Product costs are now in line with costs of non-recycled products. These catalogues should be made available to all customers on the installation with accompanying Affirmative Procurement directive.

STATUS OF CORRECTION: NO ACTION YET

CORRECTIVE ACTION: Establish Director of Contracting (DOC) proponency with coordination and technical assistance from Director of Environment (DOE) for Affirmative Procurement Program. Develop system of ensuring appropriate products are selected during normal procurement procedures. Estimated Cost: minimal.

CORRECTIVE ACTION TYPE: ADMINISTRATIVE OR POLICY CHANGE

COST: 0

1383 PROJECT NUMBER:

CORRECTIVE ACTION COMMENTS: INSTALLATION COMMENT: The group from TRADOC were going to provide assistance with this. DOC will develop a system of ensuring appropriate products during normal procurement procedures after we have received the information as agreed. In the meantime, we will contact TRADOC to find out what SOP's are in place from other DOC's and have something in place by 1 March 1998.

PROGRAM MANAGEMENT

The Fort Bliss environmental program was greatly improved since the last ECAS three years ago. The office was better organized with a clear mission and goals with timelines. Employees were made to account for their time and track their EPR projects. The most recent Roving Sands exercise with 35,000 soldiers participating resulted in no environmental damage requiring mitigation. This was due to the Environmental Office "getting the word out" prior to the exercise, training the participating units, and making sure the exercise areas were clearly marked. The office makes every effort to support the Bliss training mission, which was not the case in the past.

Communication between the Divisions within DOE were fragmented. This has improved since the last ECAS and was partially due to the Divisions not all collocated Information gets to the Director but not to individuals needed some improvement.

There was a significant issue with communications between the DPWL and DOE staffs. The relationship was very contentious and required a major effort on the part of the Directors to resolve.

05.8.2.A #1 III ARMY/DOD CORRECTIVE ACTION Program Management

FINDING ID: 05-SN-02

MANUAL QUESTION NUMBER: 05-008-002-A

FINDING CATEGORY: CLASS III

FINDING TYPE: Negative

EXISTING NOV: NO

LOCATION: DPWL

IFS FACILITY NUMBER: 00777

FACILITY TYPE: ADMINISTRATIVE, COMMUNICATION FACILITIES

FINDING DESCRIPTION: The Directorate of Environment (DOE) and Directorate of Public Works and Logistics (DPWL) expressed frustration with lack/timely coordination on projects especially those involving historic properties, asbestos and lead based paint. DPWL has requested specific guidance on environmental requirements for historic properties, asbestos and lead based paint. Although asbestos and lead based paint are DPWL responsibilities, DOE should provide them assistance and guidance in these two areas. For historic properties DOE should issue a guidance document outlining all requirements.

CRITERIA: Coordination and support between DPW, DOL, DOC, SJA, and RM should be promoted in order to maintain environmental compliance (MP) [December 1996].

FINDING COMMENTS:

STATUS OF CORRECTION: NO ACTION YET

CORRECTIVE ACTION: DOE should issue clear guidance on specific requirements/notifications required to maintain, renovate, lay away, etc. historic properties. Both Directorates must make every effort to coordinate in a timely manner. DOE should assist the DPWL to ensure projects involving asbestos and lead based paint are executed IAW all regulations.

CORRECTIVE ACTION TYPE: ADMINISTRATIVE OR POLICY CHANGE

COST: 0

1383 PROJECT NUMBER: N/A

CORRECTIVE ACTION COMMENTS:

05.8.3.A #1 POSITIVE ARMY/DOD CORRECTIVE ACTION Program Management

FINDING ID: 05-SN-01

MANUAL QUESTION NUMBER: 05-008-003-A

FINDING CATEGORY: POSITIVE

FINDING TYPE: Positive

EXISTING NOV: NO

LOCATION: DPTMS

IFS FACILITY NUMBER: 00002

FACILITY TYPE: TRAINING BLDGS, RANGES, COURSES, TROOP OPNS

FINDING DESCRIPTION: Previous ECAS this was a negative finding. Communications have been greatly improved since then and merit recognition. DOE had been successful in clearing more areas for training.

CRITERIA: Communication and relationships between the environmental staff and operations personnel should promote environmental stewardship (MP) [December 1996].

FINDING COMMENTS: Investigation and clearing of archeological sites on training ranges was a major Fort Bliss Commanding General initiative as was part of the Environmental Chiefs performance rating.

STATUS OF CORRECTION:

CORRECTIVE ACTION:

CORRECTIVE ACTION TYPE:

COST: 0

1383 PROJECT NUMBER:

CORRECTIVE ACTION COMMENTS: Positive finding. No corrective action needed.

O5.8.7.A #1 POSITIVE ARMY/DOD CORRECTIVE ACTION Program Management

FINDING ID: O5-SN-03

MANUAL QUESTION NUMBER: O5-008-007-A

FINDING CATEGORY: POSITIVE

FINDING TYPE: Positive

EXISTING NOV: NO

LOCATION: DOE

IFS FACILITY NUMBER: 00624

FACILITY TYPE: ADMINISTRATIVE, COMMUNICATION FACILITIES

FINDING DESCRIPTION: Environmental Office had implemented an environmental awards program to recognize those civilians and soldiers on post who demonstrated outstanding environmental stewardship.

CRITERIA: Installations should promote their positive environmental efforts (MP) [December 1996].

FINDING COMMENTS:

STATUS OF CORRECTION:

CORRECTIVE ACTION:

CORRECTIVE ACTION TYPE:

COST: 0

1383 PROJECT NUMBER:

CORRECTIVE ACTION COMMENTS: Positive finding. No corrective action needed.

O5.15.7.A #1 POSITIVE ARMY/DOD CORRECTIVE ACTION Program
Management

FINDING ID: O5-SN-04
MANUAL QUESTION NUMBER: O5-015-007-A
FINDING CATEGORY: POSITIVE
FINDING TYPE: Positive EXISTING NOV: NO
LOCATION: DOE
IFS FACILITY NUMBER: 00624
FACILITY TYPE: ADMINISTRATIVE, COMMUNICATION FACILITIES

FINDING DESCRIPTION: The Directorate of Environment (DOE) had implemented the Army Performance Improvement Criteria (APIC) management system. DOE will ultimately go under the international ISO-14001 system.

CRITERIA: Installations should have a methodology to evaluate improvement in environmental programs (MP) [December 1996].

FINDING COMMENTS: Under current management system, DOE personnel track hours spent on each project. All projects have a Ghant chart, milestones, and monthly obligation reports. DOE has ensured all hours are accountable.

STATUS OF CORRECTION:
CORRECTIVE ACTION:

CORRECTIVE ACTION TYPE:
COST: 0
1383 PROJECT NUMBER:

CORRECTIVE ACTION COMMENTS: Positive finding. No corrective action needed.

Pesticide Management

The Pest Management Program at Fort Bliss has greatly improved over the last eighteen months. The installation now possesses one of the most complete Installation Pest Management Plans. The Commanding General has issued policy reinforcing the Fort Bliss commitment to safe and responsible chemical usage. The medical monitoring and applicator education standards were also greatly improved.

Unfortunately, out of sixteen negative findings, nine were repeated from the Environmental Compliance Assessment performed three years ago. However, it can be expected that nine labeling and storage findings will be negated over the next three to four months due to improved management practices and the completion of a state-of-the-art pesticide mixing and storage facility on post. Three additional findings from a tenant activity, the El Paso Federal Correctional Institution, will disappear when that facility closes during 1998. Three findings related to non-approved pest management contracts. Meetings were held with DOC to inform them of the necessity that pesticide application contracts be approved by the MACOM Pest Management Consultant. That office agreed to include MACOM approval of pesticide application contracts in the new SOP which is currently being drafted.

The greatest barrier keeping Fort Bliss from being a leader in Army pest management activities is the lack of continuity in program oversight. Although required by Department of Defense Instruction 4150.7 and Army Regulation 420-76, the Installation Commander has not designated and officially appointed on orders an Installation Pest Management Coordinator. This individual is usually multi-hatted, acting as a collection point for pest management information on the installation, serving as a liaison between installation activities, and is the primary point of contact for the MACOM Pest Management Consultant.

Overall, the expectation of the assessor was for continued progress in the Fort Bliss pest management program especially if an Installation Pest Management Consultant is designated.

PM.10.2.TX #1 I STATE CORRECTIVE ACTION Pesticide

FINDING ID: PM-MLB-05

MANUAL QUESTION NUMBER: PM-010-002-TX

FINDING CATEGORY: CLASS I

FINDING TYPE: Negative

EXISTING NOV: NO

LOCATION: GOLF COURSE PESTICIDE MIXING AND STORAGE FACILITY

IFS FACILITY NUMBER: 03007

FACILITY TYPE: MAINTENANCE FACILITIES

FINDING DESCRIPTION: Several unlabeled containers (presumably pesticides) were found in the pesticide storage locker containing fungicides.

CRITERIA: Pesticides must be prominently labeled (4 TAC 7.4)
[Added June 1997].

FINDING COMMENTS:

STATUS OF CORRECTION: COMPLETE

CORRECTIVE ACTION: Overpack and dispose of unlabeled pesticides by using Defense Re-Utilization Marketing Office or return to manufacturer as identified by visible packaging identification.
ESTIMATED COST: MINIMAL.

CORRECTIVE ACTION TYPE: OPERATIONAL OR PROCEDURAL CHANGE

COST: 0

1383 PROJECT NUMBER:

CORRECTIVE ACTION COMMENTS: INSTALLATION COMMENT: Corrective action completed.

PM.1.3.A #1 III ARMY/DOD CORRECTIVE ACTION Pesticide

FINDING ID: PM-MLB-01
MANUAL QUESTION NUMBER: PM-001-003-A
FINDING CATEGORY: CLASS III
FINDING TYPE: Negative EXISTING NOV: NO
LOCATION: INST
IFS FACILITY NUMBER: INST
FACILITY TYPE: ADMINISTRATIVE, COMMUNICATION FACILITIES

FINDING DESCRIPTION: The Installation Commander had not appointed an Installation Pest Management Coordinator (IPMC). The individual should be appointed on orders and given the responsibility to monitor all pesticide usage on the entire installation. This individual would also be responsible for the Installation Pest Management Plan (IPMP), and for ensuring that the DD Form 1532 is completed.

CRITERIA: The installation must have a Pest Management Coordinator (AR 420-76, para 2-4e and 2-8).

FINDING COMMENTS: This appears to be an installation wide systemic problem. Believe correction of this deficiency would greatly decrease the number of findings by creating added oversight for the pest management program.

STATUS OF CORRECTION: INITIATED/WORK REQUEST SUBMITTED
CORRECTIVE ACTION: Identify and appoint on orders an Installation Pest Management Coordinator. This can be a multi-hatted individual but the individual should be placed high enough to function effectively across directorates. This individual should be Department of Defense trained and certified as a Pesticide Applicator and Pest Management Quality Assurance Evaluator. ESTIMATED COST \$5000/three years. ALTERNATIVE CORRECTIVE ACTION: Hire an entomologist, ESTIMATED COST \$75000.

CORRECTIVE ACTION TYPE: OTHERS
COST: 75000
1383 PROJECT NUMBER:

CORRECTIVE ACTION COMMENTS: INSTALLATION COMMENT: DOE is investigating the possibility of appointing a wildlife biologist as Pest Management Coordinator.

PM.1.7.A #1 III ARMY/DOD CORRECTIVE ACTION Pesticide

FINDING ID: PM-MLB-08
MANUAL QUESTION NUMBER: PM-001-007-A
FINDING CATEGORY: CLASS III
FINDING TYPE: Negative EXISTING NOV: NO
LOCATION: AAFES FOOD SERVICE FACILITIES
IFS FACILITY NUMBER: MULT
FACILITY TYPE: HOUSING & COMMUNITY FACILITIES
TENANT NAME: AAFES FOOD SERVICES

FINDING DESCRIPTION: A contract for the control of pests had been entered into by several AAFES Food Service Activities (i.e. Burger King B1724 & AAFES Food Court B1735). Pest control contracts for work performed on Army installations are required to be reviewed and approved by the cognizant MACOM Pest Management Consultant (PMC). The current AAFES contract has not met this requirement.

CRITERIA: Contracts for installation pest control services must be reviewed and approved prior to advertisement for bid (AR 420-76, para 3-4k, 3-12c, 3-12d, 4-3a, and 4-3c).

FINDING COMMENTS: This is a common deficiency of tenant activities. AAFES agreed to forward copy of the contract to MACOM PMC for review and approval.

STATUS OF CORRECTION:

CORRECTIVE ACTION: Forward copy of pest control contract to MACOM PMC for review and approval. ESTIMATED COST: MINIMAL.

CORRECTIVE ACTION TYPE: ADMINISTRATIVE OR POLICY CHANGE

COST: 0

1383 PROJECT NUMBER:

CORRECTIVE ACTION COMMENTS: AAFES is providing a copy of their pest control contract for MACOM review.

PM.1.7.A #2 III ARMY/DOD CORRECTIVE ACTION Pesticide

FINDING ID: PM-MLB-09

MANUAL QUESTION NUMBER: PM-001-007-A

FINDING CATEGORY: CLASS III

FINDING TYPE: Negative

EXISTING NOV: NO

LOCATION: EL PASO FEDERAL CORRECTIONAL INSTITUTION

IFS FACILITY NUMBER: 11631

FACILITY TYPE: HOUSING & COMMUNITY FACILITIES

TENANT NAME: EL PASO FED CORRECTIONAL INST.

FINDING DESCRIPTION: A contract for pest control services in the Federal Correctional Institution dining facility had been awarded without review and approval by the MACOM Pest Management Consultant (PMC) and was not being monitored by a DOD trained and recognized Quality Assurance Evaluator (QAE).

CRITERIA: Contracts for installation pest control services must be reviewed and approved prior to advertisement for bid (AR 420-76, para 3-4k, 3-12c, 3-12d, 4-3a, and 4-3c).

FINDING COMMENTS: This finding should disappear when the FCI leaves sometime during the next 12 months.

STATUS OF CORRECTION: INITIATED/WORK REQUEST SUBMITTED

CORRECTIVE ACTION: Forward current contract to MACOM PMC for review and approval to ensure that tenets of Integrated Pest Management are used. Appoint a QAE who is trained in pest management to oversee the contract. ESTIMATED COST: MINIMAL.

CORRECTIVE ACTION TYPE: ADMINISTRATIVE OR POLICY CHANGE

COST: 0

1383 PROJECT NUMBER:

CORRECTIVE ACTION COMMENTS: INSTALLATION COMMENT: Federal Prison is providing a copy of the pest control contract for MACOM review.

PM.1.7.A #3 III ARMY/DOD CORRECTIVE ACTION Pesticide

FINDING ID: PM-MLB-18

MANUAL QUESTION NUMBER: PM-001-007-A

FINDING CATEGORY: CLASS III

FINDING TYPE: Negative

EXISTING NOV: NO

LOCATION: DEPARTMENT OF CONTRACTING

IFS FACILITY NUMBER: 02021

FACILITY TYPE:

FINDING DESCRIPTION: Department of Contracting was not aware of the requirement for MACOM review of pest management contracts for services on Army posts. Pest management contracts have been awarded without MACOM approval. Pest management services had been procured using government credit cards without consideration of Army regulations.

CRITERIA: Contracts for installation pest control services must be reviewed and approved prior to advertisement for bid (AR 420-76, para 3-4k, 3-12c, 3-12d, 4-3a, and 4-3c).

FINDING COMMENTS:

STATUS OF CORRECTION: INITIATED/WORK REQUEST SUBMITTED

CORRECTIVE ACTION: Re-write Standard Operating Procedures for pest management contracts and services procured by credit card to include MACOM review and tenets put forth in Army Regulations and Department of Defense Instructions. ESTIMATED COST: MINIMAL.

CORRECTIVE ACTION TYPE: OPERATIONAL OR PROCEDURAL CHANGE

COST: 0

1383 PROJECT NUMBER:

CORRECTIVE ACTION COMMENTS: INSTALLATION COMMENT: DOC was not aware of the requirement for MACOM review of pest management contracts for services on post. This does not belong to DOC at Ft Bliss. Contracts for installation pest control services must be reviewed and approved prior to advertisement for bid. DOC has not issued any bids for Pest Control Services. The information was provided to the group from TRADOC, your finding description is wrong for DOC at Ft Bliss. The AAFES contracting activity is the Contracting Activity who procured by Credit Card and had asked for the persons identified so an audit can be completed. TRADOC sent a message to DOC requesting that next Credit Card Operating Procedures be updated to include policy on these changes. The Credit Card Administrator is aware of these changes and is

implementing them to include the next training session for Approved Officials and Credit Card users.

TRADOC COMMENT: The assessor does not concur with the installation comment. The finding should remain as is.

PM.15.1.A #1 III ARMY/DOD CORRECTIVE ACTION Pesticide

FINDING ID: PM-MLB-15

MANUAL QUESTION NUMBER: PM-015-001-A

FINDING CATEGORY: CLASS III

FINDING TYPE: Negative

EXISTING NOV: NO

LOCATION: ENTOMOLOGY EQUIPMENT YARD 9B

IFS FACILITY NUMBER: 60-76

FACILITY TYPE: MAINTENANCE FACILITIES

FINDING DESCRIPTION: Entomology activity vehicles were not clearly labeled "Contaminated With Pesticides".

CRITERIA: Vehicles used for pesticide applications must be dedicated to pest control operations and meet specific design requirements (DODR 4145.19-1, para 3-415a(3) and AR 420-76, para 4-1d and 4-1e(1)).

FINDING COMMENTS:

STATUS OF CORRECTION: COMPLETE

CORRECTIVE ACTION: Procure removable signs for pest management vehicles. These should not be of the easily removable magnetic type but of the more difficult to remove vinyl type. ESTIMATED COST: MINIMAL.

CORRECTIVE ACTION TYPE: EQUIPMENT PROCUREMENT OR CHANGE

COST: 0

1383 PROJECT NUMBER:

CORRECTIVE ACTION COMMENTS: INSTALLATION COMMENT: Signs are attached to truck windows. Corrective Action completed.

PM.40.1.A #1 III ARMY/DOD CORRECTIVE ACTION Pesticide

FINDING ID: PM-MLB-10

MANUAL QUESTION NUMBER: PM-040-001-A

FINDING CATEGORY: CLASS III

FINDING TYPE: Negative

EXISTING NOV: NO

LOCATION: EL PASO FEDERAL CORRECTIONAL INST

IFS FACILITY NUMBER: 11631

FACILITY TYPE:

TENANT NAME: EL PASO FED CORRECTIONAL INST

FINDING DESCRIPTION: Pesticide usage not recorded in accordance with requirements of AR 420-76.

CRITERIA: Specific records are required to be kept as a part of the pest management process (DODI 4150.7, para E.3.h, para. E.3.v.(7), Enclosure 4, para 10; AR 420-76, para 4-4b, 44c(1) and 4-4c(3) through 4-4c(5)) [May 1997].

FINDING COMMENTS: This finding will disappear within the next twelve months as FCI is scheduled to close.

STATUS OF CORRECTION: COMPLETE

CORRECTIVE ACTION: Record all pesticide usage and forward to installation pest management coordinator on a monthly basis.

ESTIMATED COST: MINIMAL.

CORRECTIVE ACTION TYPE: OPERATIONAL OR PROCEDURAL CHANGE

COST: 0

1383 PROJECT NUMBER:

CORRECTIVE ACTION COMMENTS: Corrective action completed. Prison staff are forwarding 1532 forms to the DPWL pest control supervisor.

PM.45.2 #1 III FEDERAL CORRECTIVE ACTION Pesticide

FINDING ID: PM-MLB-07

MANUAL QUESTION NUMBER: PM-045-002

FINDING CATEGORY: HEALTH/SAFETY

FINDING TYPE: Negative

EXISTING NOV: NO

LOCATION: GOLF COURSE MIXING AND STORAGE FACILITY

IFS FACILITY NUMBER: 03007

FACILITY TYPE: MAINTENANCE FACILITIES

FINDING DESCRIPTION: Plumbing for the golf course mixing and storage facility eye lavage and deluge shower was improperly installed rendering the safety equipment non-functional.

CRITERIA: Pesticide storage, mixing and preparation facilities must provide structures and procedures to ensure safety of personnel (29 CFR 1910.133 and 1910.134).

FINDING COMMENTS:

STATUS OF CORRECTION: INITIATED/WORK REQUEST SUBMITTED

CORRECTIVE ACTION: Have safety shower and eye lavage re-plumbed.

ESTIMATED COST: MINIMAL.

CORRECTIVE ACTION TYPE: EQUIPMENT PROCUREMENT OR CHANGE

COST: 0

1383 PROJECT NUMBER:

CORRECTIVE ACTION COMMENTS: INSTALLATION COMMENT: Other findings related to emergency showers are categorized Health/Safety rather than Class 1. DOE disagrees with the category of this finding. It should be a Health/Safety rather than a Class 1. The shower is under warranty and is being repaired by the contractor.

TRADOC COMMENT: Recommend changing the finding category to Health & Safety (H/S) category. Rationale: Criteria is 29 CFR and by definition should be a Health & Safety category.

USACHPPM COMMENT: The finding has been changed to a Health and Safety finding.

PM.45.2 #2 III FEDERAL CORRECTIVE ACTION Pesticide

FINDING ID: PM-MLB-11

MANUAL QUESTION NUMBER: PM-045-002

FINDING CATEGORY: CLASS III

FINDING TYPE: Negative EXISTING NOV: NO

LOCATION: EL PASO FEDERAL CORRECTIONAL FACILITY

IFS FACILITY NUMBER: 11631

FACILITY TYPE: HOUSING & COMMUNITY FACILITIES

TENANT NAME: EL PASO FED CORRECT FACILITY

FINDING DESCRIPTION: Professional use Dursban was stored in a plain metal cabinet in the supervisor's office at the Federal Correctional Institution.

CRITERIA: Pesticide storage, mixing and preparation facilities must provide structures and procedures to ensure safety of personnel (29 CFR 1910.133 and 1910.134).

FINDING COMMENTS: This finding will disappear within the next year when the El Paso Federal Corrections facility closes.

STATUS OF CORRECTION: NO ACTION YET

CORRECTIVE ACTION: Store pesticides with an activity on post possessing an approved storage facility. ESTIMATED COST: MINIMAL.

CORRECTIVE ACTION TYPE: OTHERS

COST: 0

1383 PROJECT NUMBER:

CORRECTIVE ACTION COMMENTS: INSTALLATION COMMENT: Agree. The prison is closing in 1998. Facility personnel do not intend to move the Dursban, which is not a "Restricted" pesticide but a "General Use" pesticide.

PM.45.2 #3 III FEDERAL CORRECTIVE ACTION Pesticide

FINDING ID: PM-MLB-12

MANUAL QUESTION NUMBER: PM-045-002

FINDING CATEGORY: CLASS III

FINDING TYPE: Negative

EXISTING NOV: NO

LOCATION: ENTOMOLOGY EQUIPMENT YARD

IFS FACILITY NUMBER: 060-76

FACILITY TYPE: MAINTENANCE FACILITIES

FINDING DESCRIPTION: The pesticide storage facility (TB 60-76, Yard 9B) was not deemed sufficient to protect public health and well-being. It does not meet the minimum standards in MIL-HDBK-1028/8A. It lacks adequate ventilation and climate control systems.

CRITERIA: Pesticide storage, mixing and preparation facilities must provide structures and procedures to ensure safety of personnel (29 CFR 1910.133 and 1910.134).

FINDING COMMENTS: Finding will be negated upon completion of new mixing and storage facility.

STATUS OF CORRECTION: INITIATED/WORK REQUEST SUBMITTED

CORRECTIVE ACTION: Continue work on new pesticide mixing and storage facility. ESTIMATED COST: MINIMAL.

CORRECTIVE ACTION TYPE: CORRECTIVE PROJECT

COST: 0

1383 PROJECT NUMBER:

CORRECTIVE ACTION COMMENTS: INSTALLATION COMMENT: Complete new pesticide mixing/storage facility and move all pesticides/herbicides and associated equipment to a new facility.

PM.45.2 #4 III FEDERAL CORRECTIVE ACTION Pesticide

FINDING ID: PM-MLB-13

MANUAL QUESTION NUMBER: PM-045-002

FINDING CATEGORY: CLASS III

FINDING TYPE: Negative

EXISTING NOV: NO

LOCATION: ENTOMOLOGY EQUIPMENT YARD 9B

IFS FACILITY NUMBER: 60-36

FACILITY TYPE: MAINTENANCE FACILITIES

FINDING DESCRIPTION: Two (2) five-gallon cans of malathion were stored in TB 60-36 in a manner inconsistent with personal safety requirements. Both cans of pesticide were open and in inadequate secondary containment. In addition, the building lacked climate control and adequate ventilation.

CRITERIA: Pesticide storage, mixing and preparation facilities must provide structures and procedures to ensure safety of personnel (29 CFR 1910.133 and 1910.134).

FINDING COMMENTS: This finding will disappear with completion of the new mixing and storage facility.

STATUS OF CORRECTION: INITIATED/WORK REQUEST SUBMITTED

CORRECTIVE ACTION: Continue work on the new pesticide mixing and storage facility. ESTIMATED COST: MINIMAL.

CORRECTIVE ACTION TYPE: OTHERS

COST: 0

1383 PROJECT NUMBER:

CORRECTIVE ACTION COMMENTS: INSTALLATION COMMENT: In progress.

PM.45.5.A #1 III ARMY/DOD CORRECTIVE ACTION Pesticide

FINDING ID: PM-MLB-17

MANUAL QUESTION NUMBER: PM-045-005-A

FINDING CATEGORY: CLASS III

FINDING TYPE: Negative

EXISTING NOV: NO

LOCATION: ENTOMOLOGY EQUIPMENT YARD 9B

IFS FACILITY NUMBER: 60-76

FACILITY TYPE: MAINTENANCE FACILITIES

FINDING DESCRIPTION: Containers for spray tank waste on entomology vehicles were not clearly marked "Contaminated With Pesticides" and stored in a lockable compartment.

CRITERIA: Movable equipment used for handling pesticides must be labeled and handled according to specific requirements (AR 420-76, para 4-1b(3)).

FINDING COMMENTS:

STATUS OF CORRECTION: COMPLETE

CORRECTIVE ACTION: Containers for tank waste should be lockable and locked to the truck in addition to being marked "Contaminated With Pesticides". Estimated Cost: MINIMAL. ALTERNATIVE CORRECTIVE ACTION: Purchase additional locking compartments for Entomology Vehicles. ESTIMATED COST: \$5000.

CORRECTIVE ACTION TYPE: EQUIPMENT PROCUREMENT OR CHANGE

COST: 5000

1383 PROJECT NUMBER:

CORRECTIVE ACTION COMMENTS: Containers marked and locked.
Corrective action completed.

PM.45.7.A #1 III ARMY/DOD CORRECTIVE ACTION Pesticide

FINDING ID: PM-MLB-04

MANUAL QUESTION NUMBER: PM-045-007-A

FINDING CATEGORY: CLASS III

FINDING TYPE: Negative

EXISTING NOV: NO

LOCATION: GOLF COURSE MIXING AND STORAGE FACILITY

IFS FACILITY NUMBER: 03007

FACILITY TYPE: MAINTENANCE FACILITIES

FINDING DESCRIPTION: A five gallon container of 2,4-D Herbicide which had apparently not been used for some time was found to be leaking in the herbicide storage locker of the mixing and storage facility at the golf course.

CRITERIA: Pesticides in deteriorated or leaking containers will be recontainerized or overpacked in approved containers (AR 420-76, para 4-2c).

FINDING COMMENTS:

STATUS OF CORRECTION: COMPLETE

CORRECTIVE ACTION: Overpack leaking container and dispose of through Defense Re-Utilization Marketing Office (DRMO). ESTIMATED COST: MINIMAL.

CORRECTIVE ACTION TYPE: CORRECTIVE PROJECT

COST: 0

1383 PROJECT NUMBER:

CORRECTIVE ACTION COMMENTS: Corrective action completed.

PM.45.7.A #2 III ARMY/DOD CORRECTIVE ACTION Pesticide

FINDING ID: PM-MLB-06

MANUAL QUESTION NUMBER: PM-045-007-A

FINDING CATEGORY: CLASS III

FINDING TYPE: Negative

EXISTING NOV: NO

LOCATION: GOLF COURSE MIXING AND STORAGE FACILITY

IFS FACILITY NUMBER: 03007

FACILITY TYPE: MAINTENANCE FACILITIES

FINDING DESCRIPTION: Several containers of the insecticide Dursban which had expired in 1991 were found in the insecticide storage locker. The metal ends on the containers were rusting and deteriorating.

CRITERIA: Pesticides in deteriorated or leaking containers will be recontainerized or overpacked in approved containers (AR 420-76, para 4-2c).

FINDING COMMENTS:

STATUS OF CORRECTION: COMPLETE

CORRECTIVE ACTION: If the pesticide is not to be used in the next 3 months, arrange to turn in the pesticides to Defense Re-Utilization Marketing Office. ESTIMATED COST: MINIMAL.

CORRECTIVE ACTION TYPE: CORRECTIVE PROJECT

COST: 0

1383 PROJECT NUMBER:

CORRECTIVE ACTION COMMENTS: Corrective action completed.

PM.45.20.A #1 III ARMY/DOD CORRECTIVE ACTION Pesticide

FINDING ID: PM-MLB-14

MANUAL QUESTION NUMBER: PM-045-020-A

FINDING CATEGORY: CLASS III

FINDING TYPE: Negative

EXISTING NOV: NO

LOCATION: ENTOMOLOGY EQUIPMENT YARD 9B

IFS FACILITY NUMBER: 60-76

FACILITY TYPE: MAINTENANCE FACILITIES

FINDING DESCRIPTION: An outdoor mixing pad is not available for use in filling large volume pesticide application equipment. Both the Entomology Shop and Roads and Grounds Shop have items of equipment which require a facility of this type.

CRITERIA: Installations must include certain features in pest management facilities (DODI 4150.7, Enclosure 4, para 6.b and MIL-HDBK 1028-8A, para 3.1.3, 3.1.4.3, and 3.4.8) [May 1996].

FINDING COMMENTS: Completion of new facility will eliminate this finding.

STATUS OF CORRECTION: INITIATED/WORK REQUEST SUBMITTED

CORRECTIVE ACTION: Continue work on the new pesticide mixing and storage facility. ESTIMATED COST: MINIMAL.

CORRECTIVE ACTION TYPE: CORRECTIVE PROJECT

COST: 0

1383 PROJECT NUMBER:

CORRECTIVE ACTION COMMENTS: INSTALLATION COMMENT: In progress.

PM.45.5.A #1 HS ARMY/DOD CORRECTIVE ACTION Pesticide

FINDING ID: PM-MLB-16

MANUAL QUESTION NUMBER: PM-045-005-A

FINDING CATEGORY: HEALTH/SAFETY

FINDING TYPE: Negative

EXISTING NOV: NO

LOCATION: ENTOMOLOGY EQUIPMENT YARD 9B

IFS FACILITY NUMBER: 60-36

FACILITY TYPE: MAINTENANCE FACILITIES

FINDING DESCRIPTION: Containers of water used for filling hand sprayers were transported in the beds of the entomology trucks. Original uses for these containers included used pesticide containers, water jugs, as well as a juice container and were unmarked. These containers should be of a standard type and clearly marked as "Non-Potable Water".

CRITERIA: Movable equipment used for handling pesticides must be labeled and handled according to specific requirements (AR 420-76, para 4-1b(3)).

FINDING COMMENTS:

STATUS OF CORRECTION: COMPLETE

CORRECTIVE ACTION: Procure standard containers for sprayer make-up water and clearly label them "Non-Potable Water". ESTIMATED COST: MINIMAL.

CORRECTIVE ACTION TYPE: EQUIPMENT PROCUREMENT OR CHANGE

COST: 0

1383 PROJECT NUMBER:

CORRECTIVE ACTION COMMENTS: Container labeled "Non-Potable Water." Corrective action completed.

PM.2.1 #1 POSITIVE ARMY/DOD CORRECTIVE ACTION Pesticide

FINDING ID: PM-MLB-03
MANUAL QUESTION NUMBER: PM-002-001
FINDING CATEGORY: POSITIVE
FINDING TYPE: Positive EXISTING NOV: NO
LOCATION: OCCUPATIONAL HEALTH
IFS FACILITY NUMBER: 02496
FACILITY TYPE: HOSPITAL & MEDICAL FACILITIES

FINDING DESCRIPTION: Occupational Health Nurse has initiated program of quarterly Red Blood Cell (RBC) cholinesterase monitoring for pesticide applicators. The applicators also received annual physicals and were compliant about scheduling appointments. All applicators are within acceptable levels of RBC cholinesterase.

CRITERIA: Installations/CW facilities are required to comply with all applicable Federal regulatory requirements not contained in this checklist (a finding under this checklist item will have the citation of the applied regulation as a basis of finding).

FINDING COMMENTS:

STATUS OF CORRECTION:
CORRECTIVE ACTION:

CORRECTIVE ACTION TYPE:
COST: 0
1383 PROJECT NUMBER:

CORRECTIVE ACTION COMMENTS: Positive finding. No corrective action needed.

PM.5.1.A #1 POSITIVE ARMY/DOD CORRECTIVE ACTION Pesticide

FINDING ID: PM-MLB-02

MANUAL QUESTION NUMBER: PM-005-001-A

FINDING CATEGORY: POSITIVE

FINDING TYPE: Positive

EXISTING NOV: NO

LOCATION:

IFS FACILITY NUMBER: INST

FACILITY TYPE: ADMINISTRATIVE, COMMUNICATION FACILITIES

FINDING DESCRIPTION: The installation Commanding General issued a policy memorandum dated 08 Dec 96 clarifying the responsibility for safe pesticide application and asserting the requirement that pesticide (and herbicide) applicators on Fort Bliss be duly certified.

CRITERIA: Installation pest management personnel are required to meet specific certification requirements (DODI 4150.7, para. E.3.v.(4) and Enclosure 4, para 5.b; AR 420-76, para 3-1) [May 1997].

FINDING COMMENTS: The Commanding General is to be congratulated for his proactive policy regarding his policy for safe chemical usage at Fort Bliss. The policy establishes Fort Bliss as a leader in implementing the policies of the Deputy Under Secretary of Defense for Environmental Security (DUSD/ES) with regard to installation pest management.

STATUS OF CORRECTION:

CORRECTIVE ACTION:

CORRECTIVE ACTION TYPE:

COST: 0

1383 PROJECT NUMBER:

CORRECTIVE ACTION COMMENTS: Positive finding. No corrective action needed.

PETROLEUM, OILS, AND LUBRICANTS (POL) MANAGEMENT

The Fort Bliss petroleum, oil and lubricant (POL) management practices were good and have been effective in preventing spill incidents. Installation personnel had a good understanding of the requirements on POL handling, storage, spill prevention and spill response procedures. This is contributed to the ongoing training and awareness provided by the Directorate of Environment. There were no significant findings found during the assessment.

PO.20.2 #1 I FEDERAL CORRECTIVE ACTION POL

FINDING ID: PO-KP-06

MANUAL QUESTION NUMBER: PO-020-002

FINDING CATEGORY: CLASS I

FINDING TYPE: Negative

EXISTING NOV: NO

LOCATION: DPWL ROADS AND GROUNDS

IFS FACILITY NUMBER: 01073

FACILITY TYPE: MAINTENANCE FACILITIES

FINDING DESCRIPTION: Three containment structures used for storage of POL products had open storm water drain valves.

CRITERIA: Drainage of rainwater from diked areas must be controlled by a valve which is closed when not in active use (40 CFR 112.7(e)(1) and 112.7(e)(2)(iii)).

FINDING COMMENTS: Prior to draining accumulated rainwater, a visual inspection must be made to verify that no spilled product is within the containment area (e.g. no visible oil sheen). A log must be maintained which lists the date, volume of discharged storm water, a certification that no contamination was present and a signature of the responsible individual.

STATUS OF CORRECTION: COMPLETE

CORRECTIVE ACTION: Ensure valves on secondary containment structures remain closed at all times except to drain accumulated storm water. Estimated Cost: minimal.

CORRECTIVE ACTION TYPE: OPERATIONAL OR PROCEDURAL CHANGE

COST: 0

1383 PROJECT NUMBER:

CORRECTIVE ACTION COMMENTS: INSTALLATION COMMENT: Corrective action completed.

PO.65.6 #1 I FEDERAL CORRECTIVE ACTION POL

FINDING ID: PO-MB-01

MANUAL QUESTION NUMBER: PO-065-006

FINDING CATEGORY: CLASS I

FINDING TYPE: Negative

EXISTING NOV: NO

LOCATION: INST

IFS FACILITY NUMBER: INST

FACILITY TYPE: MAINTENANCE FACILITIES

FINDING DESCRIPTION: Used oil containers at the following activities were improperly labeled: Directorate of Public Works and Logistics (DPWL) Heavy Equipment Maintenance Shop, Bldg# 2588; DPWL GSA Motorpool, Bldg# 1334; DPWL Locomotive Maintenance Shop, Bldg# 1378; GAFAD Motorpool, Bldg# 1076; 108th ADA HHB Motorpool, Bldg# 2423; TESCO Maintenance Shop, Bldg# 11304; Directorate of Community Activities (DCA) Auto Craft Shop, Bldg# 820; DPWL Roads and Grounds, Bldg# 1073; 35th ADA, 178th Motorpool, Bldg# 2643; 35th ADA, 2/1st BN Motorpool, Bldg# 2692; 11th ADA, 286 SIG BN Motorpool, Bldg# 2680; DPWL Power Plant, Bldg# 6152. This appears to be an installation-wide systemic problem.

CRITERIA: The label USED OIL must be clearly marked on containers used to store used oil and fill pipes used to transfer used oil into underground storage facilities (40 CFR 279.22 (c)).

FINDING COMMENTS:

STATUS OF CORRECTION: COMPLETE

CORRECTIVE ACTION: Relabel used oil containers and reemphasize labeling requirements at the next waste generator meeting.

Estimated Cost: Minimal.

CORRECTIVE ACTION TYPE: OPERATIONAL OR PROCEDURAL CHANGE

COST: 0

1383 PROJECT NUMBER:

CORRECTIVE ACTION COMMENTS: INSTALLATION COMMENT: In addition to implementing the Corrective Action, DOE will check levels on used oil containers during quarterly hazardous waste inspections.

PO.20.1 #1 III FEDERAL CORRECTIVE ACTION POL

FINDING ID: PO-KP-01

MANUAL QUESTION NUMBER: PO-020-001

FINDING CATEGORY: CLASS III

FINDING TYPE: Negative

EXISTING NOV: NO

LOCATION: DPWL PAINT BOOTH

IFS FACILITY NUMBER: 02529

FACILITY TYPE: MAINTENANCE FACILITIES

FINDING DESCRIPTION: Three 55-gallon drums of paint thinner were stored adjacent to the Directorate of Public Works and Logistics paint booth without adequate secondary containment.

CRITERIA: Appropriate containment and/or diversionary structures, and cleanup equipment to prevent discharged petroleum products from reaching navigable watercourse should be readily available at the installation/CW facility (40 CFR 112.7(c) and 112.7(d)).

FINDING COMMENTS:

STATUS OF CORRECTION: COMPLETE

CORRECTIVE ACTION: Provide appropriate secondary containment for this location. Use of a 4-drum, plastic containment pallet would be adequate. Estimated Cost: minimal.

CORRECTIVE ACTION TYPE: CORRECTIVE PROJECT

COST: 0

1383 PROJECT NUMBER:

CORRECTIVE ACTION COMMENTS: INSTALLATION COMMENT: DOE gave 5 spill-control pallets to DPWL to provide secondary containment for the drums of paint thinner. Corrective action completed.

PO.20.1 #2 III FEDERAL CORRECTIVE ACTION POL

FINDING ID: PO-KP-02

MANUAL QUESTION NUMBER: PO-020-001

FINDING CATEGORY: CLASS III

FINDING TYPE: Negative

EXISTING NOV: NO

LOCATION: DPWL COMBAT AND HEAVY EQUIPMENT MAINTENANCE

IFS FACILITY NUMBER: 02588

FACILITY TYPE: MAINTENANCE FACILITIES

FINDING DESCRIPTION: Fourteen 55-gallon drums of solvent (PD 680-Type II) were stored behind Building 2588 without secondary containment.

CRITERIA: Appropriate containment and/or diversionary structures, and cleanup equipment to prevent discharged petroleum products from reaching navigable watercourse are should be readily available at the installation/CW facility (40 CFR 112.7(c) and 112.7(d)).

FINDING COMMENTS:

STATUS OF CORRECTION: COMPLETE

CORRECTIVE ACTION: Provide adequate secondary containment for this storage area and maintain on-site only those quantities necessary. Estimated Cost: minimal.

CORRECTIVE ACTION TYPE: CORRECTIVE PROJECT

COST: 0

1383 PROJECT NUMBER:

CORRECTIVE ACTION COMMENTS: INSTALLATION COMMENT: Drums were turned into DRMO. Corrective Action completed.

PO.20.1 #3 III FEDERAL CORRECTIVE ACTION POL

FINDING ID: PO-KP-03

MANUAL QUESTION NUMBER: PO-020-001

FINDING CATEGORY: CLASS III

FINDING TYPE: Negative

EXISTING NOV: NO

LOCATION: DPWL/GSA MOTORPOOL

IFS FACILITY NUMBER: 01334

FACILITY TYPE: MAINTENANCE FACILITIES

FINDING DESCRIPTION: Two 500-gallon used oil tanks were in use and did not have adequate secondary containment.

CRITERIA: Appropriate containment and/or diversionary structures, and cleanup equipment to prevent discharged petroleum products from reaching navigable watercourse should be readily available at the installation/CW facility (40 CFR 112.7(c) and 112.7(d)).

FINDING COMMENTS:

STATUS OF CORRECTION: INITIATED/WORK REQUEST SUBMITTED

CORRECTIVE ACTION: Provide adequate secondary containment for the amount of used oil which will be regularly stored at this facility. Motorpool personnel reported that a replacement, double-walled "convault" tank had been programmed for this location, no additional cost should be necessary.

CORRECTIVE ACTION TYPE: CORRECTIVE PROJECT

COST: 0

1383 PROJECT NUMBER:

CORRECTIVE ACTION COMMENTS: INSTALLATION COMMENT: Oil tanks will be turned into DRMO. DOE submitted the 1348-1 documents to turn the oil pods into DRMO for disposal. The pods will be replaced by double-walled con vault tanks purchased under a 1998 Bold Grant.

PO.20.1 #4 III FEDERAL CORRECTIVE ACTION POL

FINDING ID: PO-KP-04

MANUAL QUESTION NUMBER: PO-020-001

FINDING CATEGORY: CLASS III

FINDING TYPE: Negative

EXISTING NOV: NO

LOCATION: DPWL LOCOMOTIVE MAINTENANCE FACILITY

IFS FACILITY NUMBER: 01378

FACILITY TYPE: MAINTENANCE FACILITIES

FINDING DESCRIPTION: A drum of used oil was stored outside of the locomotive maintenance facility without secondary containment.

CRITERIA: Appropriate containment and/or diversionary structures, and cleanup equipment to prevent discharged petroleum products from reaching navigable watercourse should be readily available at the installation/CW facility (40 CFR 112.7(c) and 112.7(d)).

FINDING COMMENTS:

STATUS OF CORRECTION: COMPLETE

CORRECTIVE ACTION: Provide a 4-drum, plastic containment pallet for this location. Estimated Cost: minimal.

CORRECTIVE ACTION TYPE: EQUIPMENT PROCUREMENT OR CHANGE

COST: 0

1383 PROJECT NUMBER:

CORRECTIVE ACTION COMMENTS: INSTALLATION COMMENT: Corrective Action completed.

PO.20.1 #5 III FEDERAL CORRECTIVE ACTION POL

FINDING ID: PO-KP-05

MANUAL QUESTION NUMBER: PO-020-001

FINDING CATEGORY: CLASS III

FINDING TYPE: Negative

EXISTING NOV: NO

LOCATION: DPWL ROADS AND GROUNDS MAINTENANCE

IFS FACILITY NUMBER: 01075

FACILITY TYPE: MAINTENANCE FACILITIES

FINDING DESCRIPTION: A 500-gallon used oil tank was located in the parking lot adjacent to the Roads and Grounds maintenance facility and did not have adequate secondary containment. Personnel at the site reported that this tank was no longer used, however, it was full at the time of the assessment.

CRITERIA: Appropriate containment and/or diversionary structures, and cleanup equipment to prevent discharged petroleum products from reaching navigable watercourse should be readily available at the installation/CW facility (40 CFR 112.7(c) and 112.7(d)).

FINDING COMMENTS:

STATUS OF CORRECTION: COMPLETE

CORRECTIVE ACTION: Remove this tank if no longer needed or provide a suitable replacement equipped with secondary containment. Estimated Cost: minimal.

CORRECTIVE ACTION TYPE: CORRECTIVE PROJECT

COST: 0

1383 PROJECT NUMBER:

CORRECTIVE ACTION COMMENTS: INSTALLATION COMMENT: Tank removed and turned in to DRMO. Corrective Action completed.

PO.20.1 #6 III FEDERAL CORRECTIVE ACTION POL

FINDING ID: PO-KP-07

MANUAL QUESTION NUMBER: PO-020-001

FINDING CATEGORY: CLASS III

FINDING TYPE: Negative EXISTING NOV: NO

LOCATION: LOCKHEED MARTIN MISSILE MAINTENANCE

IFS FACILITY NUMBER: 08691

FACILITY TYPE: MAINTENANCE FACILITIES

FINDING DESCRIPTION: Three 55-gallon drums of lube oil were stored at the facility without secondary containment.

CRITERIA: Appropriate containment and/or diversionary structures, and cleanup equipment to prevent discharged petroleum products from reaching navigable watercourse should be readily available at the installation/CW facility (40 CFR 112.7(c) and 112.7(d)).

FINDING COMMENTS:

STATUS OF CORRECTION: INITIATED/WORK REQUEST SUBMITTED

CORRECTIVE ACTION: Provide a 4-drum plastic containment pallet for this location. Estimated Cost: minimal.

CORRECTIVE ACTION TYPE: EQUIPMENT PROCUREMENT OR CHANGE
COST: 0

1383 PROJECT NUMBER:

CORRECTIVE ACTION COMMENTS: INSTALLATION COMMENT: Purchase request submitted. Purchase a spill-control pallet for storing the lube oil. DOE initiated purchasing pallets to be issued on a charge-back basis to units for POL storage.

Solid Waste Management

Storage, collection, transportation, and disposal of solid wastes are handled in an efficient, environmentally safe manner at Fort Bliss. Notable findings include exceedence of permitted elevations on final cover on a portion of the landfill, and an unpermitted dump area. Operations at the contractor-operated active landfill were in compliance with the permit and State-mandated requirements, with one exception. A minor deficiency noted was the lack of a sign at the entrance to the construction and demolition debris landfill.

Significant improvements could be made in the recycling program. A negative balance in the recycling budget clearing account indicates that an economic assessment of recycling operations is needed. Increased public promotion is crucial to the future success of this program.

SO.3.1.TX #1 I STATE CORRECTIVE ACTION Solid Waste

FINDING ID: SO-DI-01

MANUAL QUESTION NUMBER: SO-003-001-TX

FINDING CATEGORY: CLASS I

FINDING TYPE: Negative

EXISTING NOV: NO

LOCATION: 31ST ADA BDE/31ST CSH

IFS FACILITY NUMBER: 01056

FACILITY TYPE: MAINTENANCE FACILITIES

FINDING DESCRIPTION: UOFs were drained and flushed, then discarded into general trash.

CRITERIA: Persons who are involved in generating, storing, transporting, handling, and processing used oil filters (UOFs) and their components must comply with Texas Title 30, Chapter 330, Subchapter Z, 330.1180.

FINDING COMMENTS:

STATUS OF CORRECTION: INITIATED/WORK REQUEST SUBMITTED

CORRECTIVE ACTION: Train personnel to drain UOFs for 24-hours before placing them in 55-gallon drums for turn-in to Defense and Reutilization Marketing Office (DRMO). Estimated Cost: minimal.

CORRECTIVE ACTION TYPE: TRAINING

COST: 0

1383 PROJECT NUMBER:

CORRECTIVE ACTION COMMENTS: INSTALLATION COMMENTS: The 31st CSH was notified about the correct procedure. Training for Fort Bliss personnel will be accomplished during monthly generators meeting and quarterly hazardous waste inspections.

SO.3.1.TX #2 I STATE CORRECTIVE ACTION Solid Waste

FINDING ID: SO-DI-02

MANUAL QUESTION NUMBER: SO-003-001-TX

FINDING CATEGORY: CLASS I

FINDING TYPE: Negative

EXISTING NOV: NO

LOCATION: 11TH ADA 286TH SIGNAL

IFS FACILITY NUMBER: 02680

FACILITY TYPE: TRAINING BLDGS, RANGES, COURSES, TROOP OPNS

FINDING DESCRIPTION: Used oil from UOFs was poured out, but the UOFs were not drained for 24-hours to ensure all free-flowing oil was removed from the UOFs as indicated in Texas Title 30, Chapter 339, Subchapter Z, 330.1186.

CRITERIA: A generator and a person owning or operating a UOF collection center shall ensure that all free-flowing oil, as defined in 330.1181 of Title 30, has been removed from UOFs stored on site (Texas Title 30, Chapter 330, Subchapter Z, 330.1186).

FINDING COMMENTS:

STATUS OF CORRECTION: INITIATED/WORK REQUEST SUBMITTED

CORRECTIVE ACTION: Train personnel to hot-drain the UOF for at least 24 hours. Estimated Cost: minimal.

CORRECTIVE ACTION TYPE: TRAINING

COST: 0

1383 PROJECT NUMBER:

CORRECTIVE ACTION COMMENTS: INSTALLATION COMMENT: The 11TH ADA was notified of the correct procedure. Ongoing training will be conducted as monthly generators meetings and during quarterly hazardous waste inspections.

SO.3.1.TX #3 I STATE CORRECTIVE ACTION Solid Waste

FINDING ID: SO-MB-01

MANUAL QUESTION NUMBER: SO-003-001-TX

FINDING CATEGORY: CLASS I

FINDING TYPE: Negative

EXISTING NOV: NO

LOCATION: DPWL, GSA MOTORPOOL

IFS FACILITY NUMBER: 01334

FACILITY TYPE: MAINTENANCE FACILITIES

FINDING DESCRIPTION: Up to six drums of used oil filters were stored for over 90 days at the Directorate of Public Works and Logistics (DPWL) GSA Motorpool, Bldg# 1334. No secondary containment had been provided and the storage site was not registered with the Texas Natural Resource Commission (TNRC).

CRITERIA: Installations/CW facilities are required to comply with state and local solid waste regulations concerning solid waste management (EO 12088, Section 1-1). The following are requirements of the Texas Used Oil Filter (UOF) regulations: A UOF storage facility is a facility that stores more than three 55-gallon drums of UOF; the site must be registered with the TNRC; UOFs may not be stored for more than 90 days; UOFs must be stored in covered enclosures or in covered rainproof containers marked "Used Oil Filters"; the storage facility must be provided with secondary containment capable of containing an amount of oil equal to ten gallons for every 55 gallon drum (30 CTR 330.1180-1184).

FINDING COMMENTS:

STATUS OF CORRECTION: COMPLETE

CORRECTIVE ACTION: Avoid the accumulation of more than three 55-gallon drums by arranging for more frequent contractor pick-ups (at least every 90 days). Estimated Cost: Minimal.

CORRECTIVE ACTION TYPE: OPERATIONAL OR PROCEDURAL CHANGE

COST: 0

1383 PROJECT NUMBER:

CORRECTIVE ACTION COMMENTS: INSTALLATION COMMENT: DOE gave GSA personnel a copy of the Texas regulations governing oil filters. GSA arranged for pick-up of the drums during the week of 15 Dec 1997. DOE will inspect the motor pool quarterly for compliance with Texas law regarding oil filters. Corrective Action completed.

SO.3.1.TX #4 I STATE CORRECTIVE ACTION Solid Waste

FINDING ID: SO-MB-02

MANUAL QUESTION NUMBER: SO-003-001-TX

FINDING CATEGORY: CLASS I

FINDING TYPE: Negative

EXISTING NOV: NO

LOCATION: DCA, AUTO CRAFT SHOP

IFS FACILITY NUMBER: 00820

FACILITY TYPE: MAINTENANCE FACILITIES

FINDING DESCRIPTION: Seven drums of used oil filters were stored outside for over 90 days at the Directorate of Community Activities (DCA) Auto Craft Shop, Bldg# 820. No secondary containment was provided and the storage site was not registered with the Texas Natural Resource Commission (TNRC). Many of the drums were not covered or labeled.

CRITERIA: Installations/CW facilities are required to comply with state and local solid waste regulations concerning solid waste management (EO 12088, Section 1-1). The following are requirements of the Texas Used Oil Filter (UOF) regulations: A UOF storage facility is a facility that stores more than three 55-gallon drums of UOF; the site must be registered with the TNRC; UOFs may not be stored for more than 90 days; UOFs must be stored in covered enclosures or in covered rainproof containers marked "Used Oil Filters"; the storage facility must be provided with secondary containment capable of containing an amount of oil equal to ten gallons for every 55 gallon drum (30 CTR 330.1180-1184).

FINDING COMMENTS:

STATUS OF CORRECTION: COMPLETE

CORRECTIVE ACTION: Avoid the accumulation of more than three 55-gallon drums by arranging for more frequent contractor pick-ups (at least every 90 days). Estimated Cost: Minimal.

CORRECTIVE ACTION TYPE: OPERATIONAL OR PROCEDURAL CHANGE

COST: 0

1383 PROJECT NUMBER:

CORRECTIVE ACTION COMMENTS: INSTALLATION COMMENT: DCA arranged for pick-up of the oil filters during the week of 15 Dec 1997. DOE will inspect the Auto Craft Shop quarterly to ensure compliance with Texas law. Corrective Action completed.

SO.10.2.TX #1 I STATE CORRECTIVE ACTION Solid Waste

FINDING ID: SO-KB-04

MANUAL QUESTION NUMBER: SO-010-002-TX

FINDING CATEGORY: CLASS I

FINDING TYPE: Negative

EXISTING NOV: NO

LOCATION: DPWL

IFS FACILITY NUMBER: MULT

FACILITY TYPE: UTILITIES & GROUND IMPROVEMENTS

FINDING DESCRIPTION: The majority of dumpsters used to store food wastes were missing drain plugs. Leakage from dumpsters may discharge to the surrounding area.

CRITERIA: Containers for the temporary storage of municipal solid waste must meet specific requirements. All solid wastes containing food wastes shall be stored in covered or closed containers which are leakproof, durable, and designed for safe handling (30 TAC, Section 330.23).

FINDING COMMENTS: Drain plugs were observed missing at the following locations: Buildings 1735, 1717, 2949, and 250.

STATUS OF CORRECTION: COMPLETE

CORRECTIVE ACTION: Contact El Paso Disposal and arrange to have drain plugs replaced after each dumpster is steam cleaned.

ESTIMATED COST: Minimal.

CORRECTIVE ACTION TYPE: OTHERS

COST: 0

1383 PROJECT NUMBER:

CORRECTIVE ACTION COMMENTS: Corrective Action completed.

SO.35.20 #1 I FEDERAL CORRECTIVE ACTION Solid Waste

FINDING ID: SO-KB-06

MANUAL QUESTION NUMBER: SO-035-020

FINDING CATEGORY: CLASS I

FINDING TYPE: Negative

EXISTING NOV: NO

LOCATION: DPWL

IFS FACILITY NUMBER: LANDFILL

FACILITY TYPE: UTILITIES & GROUND IMPROVEMENTS

FINDING DESCRIPTION: Uncontrolled dumping of solid wastes was occurring in an area south of the Fort Bliss landfill. Although off-post residents may have been a source of some of the materials, the majority of the materials appear to consist of construction debris. Ammunition packing materials were also observed at the dump site.

CRITERIA: Open dumping is prohibited at the installation/CW facility (40 CFR 257.1(a)(2)) [March 1995]. The unloading of waste in unauthorized areas is prohibited (30 TAC 330.117).

FINDING COMMENTS: The following wastes were observed at the dump site: tires, furniture, mattresses, a lead-acid battery, drain culverts, concrete rubble, asphalt, wooden ammunition crates and other ammunition packing materials, wire, wooden pallets, and other scrap metal and wood.

STATUS OF CORRECTION: NO ACTION YET

CORRECTIVE ACTION: Haul wastes to the landfill or recycling center as appropriate. Construct berms around the dump site and post signs to deter further use of the area as a waste disposal site. Attempt to identify the source of the wastes and reprimand the responsible parties. An aggressive campaign to deter illegal dumping could be included in efforts to promote the recycling program. ESTIMATED COST: \$400,000 to clean up wastes.

CORRECTIVE ACTION TYPE: CORRECTIVE PROJECT

COST: 400000

1383 PROJECT NUMBER:

CORRECTIVE ACTION COMMENTS: INSTALLATION COMMENT: Agree, but the installation has no funded project to implement the Corrective Action. DOE cannot obtain funds through environmental channels. Fort Bliss Commanding General tasked Red Cycle Soldiers with cleaning up the dump site.

SO.75.1.TX #1 I STATE CORRECTIVE ACTION Solid Waste

FINDING ID: SO-KB-01

MANUAL QUESTION NUMBER: SO-075-001-TX

FINDING CATEGORY: CLASS I

FINDING TYPE: Negative

EXISTING NOV: YES

LOCATION: DOE

IFS FACILITY NUMBER: LANDFILL

FACILITY TYPE: UTILITIES & GROUND IMPROVEMENTS

FINDING DESCRIPTION: Final cover on a portion of the Fort Bliss landfill exceeds elevations specified in the closure plans.

CRITERIA: Municipal Solid Waste Landfill units that stopped receiving wastes prior to 9 October 1993 must meet specific closure requirements (30 TAC, Sections 330.251 and 330.252(a) and (c)).

FINDING COMMENTS: In November of 1992, the Texas Natural Resources Conservation Commission issued Fort Bliss a Notice of Violation for exceeding permitted elevations in an area of the landfill that had received final cover. A final grading plan had been approved by TNRCC, but funds were not available to implement this plan.

STATUS OF CORRECTION:

CORRECTIVE ACTION: Continue to work with Directorate of Public Works and Logistics to identify a funding source to implement the final grading plan. ESTIMATED COST: \$1,132,000.

CORRECTIVE ACTION TYPE: CORRECTIVE PROJECT

COST: 1132000

1383 PROJECT NUMBER:

CORRECTIVE ACTION COMMENTS:

SO.140.1.TX #1 I STATE CORRECTIVE ACTION Solid Waste

FINDING ID: SO-KB-07

MANUAL QUESTION NUMBER: SO-140-001-TX

FINDING CATEGORY: CLASS I

FINDING TYPE: Negative

EXISTING NOV: NO

LOCATION: DOE

IFS FACILITY NUMBER: LANDFILL

FACILITY TYPE: UTILITIES & GROUND IMPROVEMENTS

FINDING DESCRIPTION: No signs prohibiting dumping of putrescible wastes were observed at the construction and demolition landfill.

CRITERIA: Installations/CW facilities with Construction and Demolition disposal sites must meet specific requirements for the acceptance of waste. Type IV landfill operators and owners shall post large conspicuous warning signs at all entrances to the site stating that putrescible wastes are not accepted (30 TAC, Section 330.117(h)) [Revised June 1997].

FINDING COMMENTS:

STATUS OF CORRECTION: INITIATED/WORK REQUEST SUBMITTED

CORRECTIVE ACTION: Post a conspicuous sign ("NO PUTRESCIBLE WASTES") at the entrance to the rubble pit. ESTIMATED COST: Minimal.

CORRECTIVE ACTION TYPE: EQUIPMENT PROCUREMENT OR CHANGE

COST: 0

1383 PROJECT NUMBER:

CORRECTIVE ACTION COMMENTS: INSTALLATION: Initiated/Contract modification in progress. DPWL is modifying the contract with the landfill operator to post a sign prohibiting dumping of putrescible wastes.

SO.1.2.A #1 III ARMY/DOD CORRECTIVE ACTION Solid Waste

FINDING ID: SO-KB-08

MANUAL QUESTION NUMBER: SO-001-002-A

FINDING CATEGORY: CLASS III

FINDING TYPE: Negative

EXISTING NOV: NO

LOCATION: DOE

IFS FACILITY NUMBER: INST

FACILITY TYPE: UTILITIES & GROUND IMPROVEMENTS

FINDING DESCRIPTION: Very few activities were aware of the Fort Bliss policy for disposal of aerosol cans, which is to transport aerosol cans to the Defense Reutilization and Marketing Office where they could be safely punctured, then recycled as scrap metal.

CRITERIA: Management and organization of paperwork, materials, and personnel should be done in a manner that prevents noncompliance and recurrence of noncompliance, precludes/minimizes regulatory enforcement actions (including warning letters, etc.) promotes good public relations, and addresses systemic weaknesses in the overall operation of the program (MP). Installation personnel should be periodically informed about materials that are prohibited from disposal in solid waste receptacles (MP).

FINDING COMMENTS: Activities disposing of aerosol cans in dumpsters include 11th ADA 699th Maintenance (Building #1050) and 31st CSH 31st ADA (Building #1056).

STATUS OF CORRECTION: INITIATED/WORK REQUEST SUBMITTED

CORRECTIVE ACTION: Include instructions for proper disposal of aerosol cans in educational materials distributed for promotion of the recycling program. Provide instruction for proper disposal of aerosol cans during quarterly Directorate of Environment hazardous waste inspections. ESTIMATED COST: Minimal (See finding SO-KB-05).

CORRECTIVE ACTION TYPE: TRAINING

COST: 0

1383 PROJECT NUMBER:

CORRECTIVE ACTION COMMENTS: INSTALLATION COMMENT: Agree. Instructions will also be included in the monthly hazardous waste generators meetings. Will present an instruction module on recycling at the February generators meetings. Recycling is already included in the hazardous waste inspections.

SO.1.3.A #1 III ARMY/DOD CORRECTIVE ACTION Solid Waste

FINDING ID: SO-KB-02

MANUAL QUESTION NUMBER: SO-001-003-A

FINDING CATEGORY: CLASS III

FINDING TYPE: Negative

EXISTING NOV: NO

LOCATION: DOE

IFS FACILITY NUMBER: 00624

FACILITY TYPE: UTILITIES & GROUND IMPROVEMENTS

FINDING DESCRIPTION: A written Integrated Solid Waste Management Plan (ISWMP) was not prepared, however, an ISWMP was being developed.

CRITERIA: Installations are required to establish local procedures and responsibilities for the execution of the waste management program and have an Integrated Solid Waste Management Plan (AR 200-1, para 52b and 5-10b(1)) [February 1997].

FINDING COMMENTS: The United States Army Environmental Hygiene Agency Technical Guide "Preparing an Integrated Solid Waste Management Plan, a Guide for Army Installations" may provide useful information for technical guidance of the draft ISWMP.

STATUS OF CORRECTION: INITIATED/WORK REQUEST SUBMITTED

CORRECTIVE ACTION: Prepare and implement an ISWMP. ESTIMATED COST: Minimal

CORRECTIVE ACTION TYPE: OTHERS

COST: 0

1383 PROJECT NUMBER:

CORRECTIVE ACTION COMMENTS: INSTALLATION COMMENT: In progress.

SO.2.1.A #1 III ARMY/DOD CORRECTIVE ACTION Solid Waste

FINDING ID: SO-KM-01

MANUAL QUESTION NUMBER: SO-002-001-A

FINDING CATEGORY: CLASS III

FINDING TYPE: Negative

EXISTING NOV: NO

LOCATION: WBAMC/RADIOLOGY-ER

IFS FACILITY NUMBER: 07777

FACILITY TYPE: HOSPITAL & MEDICAL FACILITIES

TENANT NAME: WILLAIM BEAUMONT AMC

FINDING DESCRIPTION: Regulated Medical Waste (RMW) had been stored in a RMW bin located in a unsecured area (hallway) outside Radiology and Emergency Room. Non-hospital personnel had access to the hallway and to the contents of the RMW bin.

CRITERIA: Store RMW, excluding pathological waste, in the RMW storage area. This area will be secured, properly identified, and kept clean and free from pest. (HSC Reg 40-35)

FINDING COMMENTS:

STATUS OF CORRECTION: COMPLETE

CORRECTIVE ACTION: Secure the RMW bin(s) by moving them into a secured area or maintain the bins in their current location and secure the lid of the bin to prevent access by unauthorized persons. Estimated Cost: Minimal.

CORRECTIVE ACTION TYPE: OPERATIONAL OR PROCEDURAL CHANGE

COST: 0

1383 PROJECT NUMBER:

CORRECTIVE ACTION COMMENTS: INSTALLATION COMMENTS: Lids secured. Corrective action completed.

SO.10.1.A #1 III ARMY/DOD CORRECTIVE ACTION Solid Waste

FINDING ID: SO-KB-03

MANUAL QUESTION NUMBER: SO-010-001-A

FINDING CATEGORY: CLASS III

FINDING TYPE: Negative

EXISTING NOV: NO

LOCATION: DPWL

IFS FACILITY NUMBER: MULT

FACILITY TYPE: HOUSING & COMMUNITY FACILITIES

FINDING DESCRIPTION: Solid wastes had not been properly disposed. A wooden staircase and several articles of litter were observed surrounding the dumpster located behind the Auto Crafts Center (Building #820). Pallets, weathered cardboard, and additional litter were also observed near the salvage area. Litter was observed scattered around the dumpster at the Officer's Club (Building #250).

CRITERIA: Army installations are required to follow specific requirements for solid waste storage, collection, and cleaning of equipment (AR 420-47, para 3-4a) [February 1997].

FINDING COMMENTS:

STATUS OF CORRECTION: COMPLETE

CORRECTIVE ACTION: Clean up spilled litter and refuse around dumpsters and salvage area. Arrange for transportation of wooden stairs to the Fort Bliss sanitary landfill. ESTIMATED COST: Minimal.

CORRECTIVE ACTION TYPE: CORRECTIVE PROJECT

COST: 0

1383 PROJECT NUMBER:

CORRECTIVE ACTION COMMENTS: Corrective Action completed.

SO.25.1.A #1 III ARMY/DOD CORRECTIVE ACTION Solid Waste

FINDING ID: SO-KB-05

MANUAL QUESTION NUMBER: SO-025-001-A

FINDING CATEGORY: CLASS III

FINDING TYPE: Negative

EXISTING NOV: NO

LOCATION: DCA / RECYCLING CENTER

IFS FACILITY NUMBER: INST

FACILITY TYPE: UTILITIES & GROUND IMPROVEMENTS

FINDING DESCRIPTION: The recycling program was recycling 19.4% of all non-hazardous solid waste generated at Fort Bliss. This was below the State goal of 40%. Materials had not been recycled to the maximum extent possible for several reasons. Much of the solid waste stream consisted of cardboard, paper, and wood. Recycling did not have high visibility to military units or civilian personnel at Fort Bliss. Less than 1% of all recyclables were collected from military family housing.

CRITERIA: Army installations are encouraged to participate in any state or local recycling programs and to reduce the volume of solid waste materials at the source whenever practical (DOD 4165.60, para V(a), V(c), and V(h), and AR 200-1, para 5-10b(8)). It is the State's goal to achieve by January 1, 1994, the recycling of at least 40% of the State's municipal solid waste stream (30 TAC, Chapter 330, Section 330.1051).

FINDING COMMENTS:

STATUS OF CORRECTION: INITIATED/WORK REQUEST SUBMITTED

CORRECTIVE ACTION: (1) Obtain command support for the recycling program in the form of additional command directives and clarification of roles and responsibilities to implement the program. (2) Develop a public awareness program to promote recycling. (3) Provide deskside containers and recycling dumpsters to large generators and arrange for scheduled pickups. (4) Post signs on all dumpsters listing recyclable materials and procedures for recycling. (4) Develop enforcement policies for failure to participate in the Fort Bliss mandatory recycling program. (5) It is recommended that the recycling committee meet with greater frequency. ESTIMATED COST:\$10,000 for public awareness program, \$110,000 for recycling containers and scheduled pickups, \$2,000 for signs.

CORRECTIVE ACTION TYPE: CORRECTIVE PROJECT

COST: 122000

1383 PROJECT NUMBER:

CORRECTIVE ACTION COMMENTS: INSTALLATION COMMENTS: Recycling containers. DOE submitted funding request for \$118,000 to TRADOC to buy recycling containers that will be placed throughout the installation.

SO.1.2.A #1 POSITIVE ARMY/DOD CORRECTIVE ACTION Solid Waste

FINDING ID: SO-KB-09

MANUAL QUESTION NUMBER: SO-001-002-A

FINDING CATEGORY: POSITIVE

FINDING TYPE: Positive

EXISTING NOV: NO

LOCATION: DOE SOLID WASTE MANAGEMENT PROGRAM

IFS FACILITY NUMBER: 00624

FACILITY TYPE: UTILITIES & GROUND IMPROVEMENTS

FINDING DESCRIPTION: Solid waste management is conducted in an enthusiastic and innovative manner that promotes cooperation and teamwork with various solid waste generators and handlers.

CRITERIA: Management and organization of paperwork, materials, and personnel should be done in a manner that prevents noncompliance and recurrence of noncompliance, precludes/minimizes regulatory enforcement actions (including warning letters, etc.) promotes good public relations, and addresses systemic weaknesses in the overall operation of the program (MP).

FINDING COMMENTS:

STATUS OF CORRECTION:

CORRECTIVE ACTION:

CORRECTIVE ACTION TYPE:

COST: 0

1383 PROJECT NUMBER:

CORRECTIVE ACTION COMMENTS: Positive finding. No corrective action needed.

STORAGE TANK MANAGEMENT

The most significant finding for this protocol pertained to the underground storage tank (UST) program. Tentative plans to replace, remove, or upgrade regulated USTs are scheduled to be completed during FY98. The contracts for the USTs need to be started so that Fort Bliss can meet the 22 December 1998 compliance deadline. In the State of Texas, USTs were subject to spill and overfill protection requirements by 22 December 1994. Deficiencies for USTs include corrosion protection, spill and overfill protection, and leak detection. Records should include but not limited to the following: registration, location, size, composition, contents, spill and overfill protection, corrosion protection, leak detection, testing and maintenance for all tanks on the installation. The lack of a well-documented tank management plan was the root cause for UST and above ground storage tank (AST) deficiencies. A tank management system consisting of consolidated records is necessary. A system to perform and document integrity testing of ASTs was not in place. An accurate inventory of all ASTs and USTs was not available, however the DOE staff was aware of all inventory discrepancies and was knowledgeable about the conditions of existing tanks.

ST.10.1 #1 I FEDERAL CORRECTIVE ACTION Storage Tanks

FINDING ID: ST-SC-01

MANUAL QUESTION NUMBER: ST-010-001

FINDING CATEGORY: CLASS I

FINDING TYPE: Negative

EXISTING NOV: NO

LOCATION: DPWL POL TANK FARM

IFS FACILITY NUMBER: MULT

FACILITY TYPE: SUPPLY & STORAGE FACILITIES, LOGISTICS

FINDING DESCRIPTION: The bulk POL tank farm has one aboveground storage tank (AST) that is subject to reporting and recordkeeping requirements under 40 CFR 60, Subpart Kb, Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquids) for which Construction, Reconstruction, or Modification Commenced after July 23, 1984. The following have to comply with 40 CFR 60, Subpart kb: 25k AST, (MOGAS Tank No. 11019). Tank No. 11019 was installed in 1983, greater than 20k gallons, and stores gasoline at greater than 2 pounds per square inch (psi) that has a vapor pressure.

CRITERIA: Bulk gasoline terminals with greater than 75,700 L [19,997.82 gal] gasoline throughput per day that deliver liquid product into tank trucks and that started construction or modification after 17 December 1980 are required to meet specific operating standards (40 CFR 60 through 60.110b).

FINDING COMMENTS:

STATUS OF CORRECTION: NO ACTION YET

CORRECTIVE ACTION: The best alternative for Fort Bliss is to seek an exemption under 40 CFR 60, Subpart Kb. The stringent recordkeeping, monitoring and reporting requirements are for storage vessels greater than 20,000 gallons (gal) and dispense more than 20,000 gal per day (bulk gasoline plants only). The daily throughput at the Fort Bliss tank farm for MOGAS (gasoline) tanks are well below 20,000 gal/day. Fort Bliss should seek a federally enforceable limit (< 20,000 gal/day) by submitting a Form PI-8 (formal exemption) with the Texas Natural Resource and Conservation Commission (TNRCC). The JP-8 stored has a very low true vapor pressure that is not in the specified vapor pressure range under 40 CFR 60, Subpart Kb, therefore the requirements will not apply to the JP-8 tanks over 20,000 gal.

CORRECTIVE ACTION TYPE: ADMINISTRATIVE OR POLICY CHANGE

COST: 0

1383 PROJECT NUMBER:

CORRECTIVE ACTION COMMENTS: INSTALLATION COMMENT: This finding is not applicable to Bliss' bulk fuel farm and should be deleted. The text of the finding agrees with my opinion in the section labeled Suggested/Alternative Corrective Action. It states that the requirements "will not apply to the JP-8 tanks over 20k gallons." Three of the 4 tanks cited are JP-8 tanks over 20k gallons, so they are exempt. The tank cited is an unleaded gasoline AST for which the finding states that Bliss should seek an exemption. There is no need to seek an exemption because Bliss dispenses far less than the 20k gallons/day limit indicated in 40 CFR 60, Subpart Kb. Bliss typically dispenses about 75k gallons of gasoline/year (about 288 gallons/day).

TRADOC COMMENT: Recommend the finding be deleted. The criteria does not match the finding description.

USACHPPM COMMENT: Only tank (No. 11019, 25k gal., MOGAS) is subject to requirements of 40 CFR 60, Subpart Kb, the tank has to be limited by some enforceable regulatory requirement. Fort Bliss does not have any such regulatory limits on their MOGAS dispensing operations at the Tank Farm. To ensure formal/documented exemption and/or compliance with Subpart Kb, recommend that an enforceable limit be accepted for the MOGAS tank.

ST.60.1 #1 I FEDERAL CORRECTIVE ACTION Storage Tanks

FINDING ID: ST-BN-06

MANUAL QUESTION NUMBER: ST-060-001

FINDING CATEGORY: CLASS I

FINDING TYPE: Negative

EXISTING NOV: NO

LOCATION: DPWL GSA MOTORPOOL

IFS FACILITY NUMBER: 01326

FACILITY TYPE: SUPPLY & STORAGE FACILITIES, LOGISTICS

FINDING DESCRIPTION: An underground storage tank located at building #1326 with double walls and interstitial monitoring for leak detection was inspected during the ECAS. The leak detection monitor alarm was sounding indicating that the monitor was not functioning properly or a leak may have occurred.

CRITERIA: Underground storage tanks are required to provide a method, or combination of methods of release detection (40 CFR 280.10(c), 280.10(d), and 280.40) [June 1997]. Owners must ensure that the release detection system is installed, calibrated, operated, and maintained in accordance with the manufacturer's instructions, including routine maintenance and service checks for operability or running condition (40 CFR 280.40(a)(2)).

FINDING COMMENTS: The alarm on the monitor was sounding and the display indicated a leak alarm, annual test alarm, delivery needed, low product alarm, and a sudden loss alarm. This could be due to a malfunctioning monitor or an actual leak.

STATUS OF CORRECTION: COMPLETE

CORRECTIVE ACTION: Ensure release detection monitors are frequently inspected, train local employees on the operation of the monitors, and ensure notification requirements in case of alarm/malfunction are prominently posted. Estimated Cost: minimal. Repair/replace non-operable monitors. Estimated Cost: \$2,000/monitor to replace. Perform tightness testing of UST to ensure a leak has not occurred. Estimated Cost: \$1,000/test.

CORRECTIVE ACTION TYPE: CORRECTIVE PROJECT

COST: 3000

1383 PROJECT NUMBER:

CORRECTIVE ACTION COMMENTS: INSTALLATION COMMENT: The monitor was repaired during the week of 15 December 1997. Corrective action completed.

TRADOC COMMENT: It is not clear why this is a finding. From the finding description, the tank had a leak detection system and there is no indication of poor maintenance, lack of calibration, lack of inspection of the monitor, or any other deficiency by the installation. A false alarm does not constitute non-compliance.

USACHPPM COMMENT: An alarm was sounding on the leak detection monitoring system. The individuals responsible for monitoring the tank was aware of the alarm, but failed to report it to the installation. The print-out from the monitoring system registered "leak occurred, loss detected". The alarm itself was sounding the "sudden loss" alarm. The actual cause of the alarm was unknown. Assuming that the worst of the two situations has occurred constitutes non-compliance (i.e. a leak was detected).

ST.90.2 #1 I FEDERAL CORRECTIVE ACTION Storage Tanks

FINDING ID: ST-BN-05

MANUAL QUESTION NUMBER: ST-090-002

FINDING CATEGORY: CLASS I

FINDING TYPE: Negative

EXISTING NOV: NO

LOCATION: INSTALLATION-WIDE

IFS FACILITY NUMBER: INST

FACILITY TYPE: SUPPLY & STORAGE FACILITIES, LOGISTICS

FINDING DESCRIPTION: Tank inventory list is inaccurate. Records of tank registrations, monthly inventory control and annual tightness testing, corrosion testing, repairs, closures, releases and site investigations were not all immediately available. Records were not organized to facilitate confirmation of the required data. Texas and New Mexico tank records were often not in agreement with installation records.

CRITERIA: Installations/CW facilities with USTs are required to meet specific recordkeeping requirements (40 CFR 280.10(c), 280.34(b), 280.34(c), 280.45, and 280.74) [March 1995].

FINDING COMMENTS: The installation knows of the inadequate recordkeeping. A contractor was used to confirm the installations tank inventory. This inventory needs to be reviewed and given to the state.

STATUS OF CORRECTION: INITIATED/WORK REQUEST SUBMITTED

CORRECTIVE ACTION: Update the tank inventory. Develop a centralized recordkeeping system for all tank information. Register tanks if required, and obtain copies of all missing tank documents from the state. Meet with State Regulators to reconcile tank records. Estimated Cost: minimal.

CORRECTIVE ACTION TYPE: ADMINISTRATIVE OR POLICY CHANGE

COST: 0

1383 PROJECT NUMBER:

CORRECTIVE ACTION COMMENTS: INSTALLATION COMMENT: Tankman system (database) is almost ready for use at Fort Bliss. DOE files are being organized. Monthly inventory control records are supplied by individual tank users and with frequent turnover of military personnel, it is very difficult to implement training for unit POC's and to maintain complete records for monthly inventories.

ST.25.1 #1 II FEDERAL CORRECTIVE ACTION Storage Tanks

FINDING ID: ST-BN-01
MANUAL QUESTION NUMBER: ST-025-001
FINDING CATEGORY: CLASS II
FINDING TYPE: Negative EXISTING NOV: NO
LOCATION: INSTALLATION-WIDE
IFS FACILITY NUMBER: INST
FACILITY TYPE: SUPPLY & STORAGE FACILITIES, LOGISTICS

FINDING DESCRIPTION: The installation has approximately 136 Underground Storage Tanks (USTs). Of these, 23 USTs do not meet the new UST system requirements or the upgrade requirements. Upgrading includes the lining and/or cathodic protection of steel tanks, the cathodic protection of underground piping which routinely contains material, and the provision of spill and overfill prevention equipment. The installation has developed a plan for the replacement and upgrading of USTs located at buildings: #11339, #2624, #1318, #2986, #11185, #3672, #2588, #2626, #2631, #2632, #2629, #8659, #9481, #9482, #1045, and #9484.

CRITERIA: Substandard UST systems are required to be upgraded, closed, or removed from service by 22 December 1998 (40 CFR 280.10(c) and 280.21(a) through 280.21(c)).

FINDING COMMENTS: Fort Bliss has a contract with Laguna Construction Company for \$1,397,000. The contract includes upgrading, removal, and replacement of the 23 substandard USTs.

STATUS OF CORRECTION: INITIATED/WORK REQUEST SUBMITTED
CORRECTIVE ACTION: Options: 1) Close and remove all substandard USTs before 22 December 1998. Estimated Cost: \$50,000/tank (includes initial sampling but not remediation). Replace with USTs meeting new requirements (Estimated Cost: \$40,000/20,000 gal tank), or replace with above ground tanks (Estimated Cost: \$40,000/20,000 gal tank). 2) Upgrade tanks to comply with standards before 22 December 1998. Estimated cost/20,000 gal tank: \$10,000 internal lining; \$9,000 cathodic protection; \$1,000 spill and overflow/overfill protection.

CORRECTIVE ACTION TYPE: CORRECTIVE PROJECT
COST: 100000
1383 PROJECT NUMBER:

CORRECTIVE ACTION COMMENTS: INSTALLATION COMMENT: Remove steel tanks. Upgrade fiberglass tanks. Phase 4 removal/upgrade is in progress.

ST.5.1 #1 III FEDERAL CORRECTIVE ACTION Storage Tanks

FINDING ID: ST-BN-02

MANUAL QUESTION NUMBER: ST-005-001

FINDING CATEGORY: CLASS I

FINDING TYPE: Negative

EXISTING NOV: NO

LOCATION: 11TH ADA

IFS FACILITY NUMBER: 02464

FACILITY TYPE: MAINTENANCE FACILITIES

FINDING DESCRIPTION: Secondary containment was not provided for 12 tank trucks containing fuel at building #2464 (11th ADA). Trucks are parked upgrade from a storm drain. Any spill or leak could potentially reach the storm drain. No visual evidence indicated that a leak or spill had occurred.

CRITERIA: All bulk storage tanks (over 660 gal [2498 L]) should be provided with a secondary means of containment for the entire contents of the largest single tank plus sufficient freeboard to allow for precipitation (40 CFR 112.1(d), 112.7(d), and 112.7(e)(2)(ii)). Mobile or portable oil storage tanks should be positioned so as to prevent spilled oil from reaching navigable waters and a secondary means of containment should be furnished (40 CFR 112.7(e)(2)(xi)).

FINDING COMMENTS:

STATUS OF CORRECTION: NO ACTION YET

CORRECTIVE ACTION: Provide secondary containment - Options: 1) Relocate tank trucks to an adequate contained area. Estimated Cost: minimal. 2) Construct impervious containment that will hold the contents of the largest tank, with sufficient freeboard to accommodate precipitation (generally 10% of volume). Estimated Cost: \$20/ft of 6-in concrete berming; \$2/sq ft installed liner for existing berm; \$0.50/sq ft sand bag berm with plastic tarp liner.

CORRECTIVE ACTION TYPE: CORRECTIVE PROJECT

COST:

1383 PROJECT NUMBER:

CORRECTIVE ACTION COMMENTS: INSTALLATION COMMENT: An A106 funding request will be submitted in the spring of 1998. Construct impervious containment.

TRADOC COMMENT: Recommend the finding category be changed to a Class 1. Rationale: Release from tank trucks would reach the

storm drain and navigable waters. Recommend adding a third alternative: "Obtain spill protection materials for use during fueling operations to prevent any POL products from reaching the storm drain.

USACHPPM COMMENT: The assessor will change finding classification. The installation was required to provide one of two things: secondary containment for mobile tankers or address spill control and cleanup procedures in the Spill Prevention, Control, and Countermeasures Plan. Both of these are not maintained.

ST.5.1 #2 III FEDERAL CORRECTIVE ACTION Storage Tanks

FINDING ID: ST-BN-04

MANUAL QUESTION NUMBER: ST-005-001

FINDING CATEGORY: CLASS III

FINDING TYPE: Negative

EXISTING NOV: NO

LOCATION: BIGGS BULK POL

IFS FACILITY NUMBER: 11024

FACILITY TYPE: SUPPLY & STORAGE FACILITIES, LOGISTICS

FINDING DESCRIPTION: Bulk fuel storage tank #11024 was located in an unlined bermed area. Should a spill occur, this containment area would prove to be inadequate as fuel would seep into the ground. Storage tanks #11022 and #11025 also do not have liners; however, these tanks are currently not in use. No visual evidence indicated that a leak or spill had occurred.

CRITERIA: All bulk storage tanks (over 660 gal [2498 L]) should provide a secondary means of containment for the entire contents of the largest single tank plus sufficient freeboard to allow for precipitation (40 CFR 112.1(d), 112.7(d), and 112.7(e)(2)(ii)).

FINDING COMMENTS: The installation is aware of the problem and is waiting for adequate funding to provide a liner for the containment area.

STATUS OF CORRECTION: INITIATED/WORK REQUEST SUBMITTED

CORRECTIVE ACTION: Provide a means of secondary containment; construct impervious containment that will hold the contents of the largest tank, with sufficient freeboard to accommodate precipitation (generally 10% of volume). Estimated Cost: \$2/sq ft installed liner for existing berm.

CORRECTIVE ACTION TYPE: CORRECTIVE PROJECT

COST:

1383 PROJECT NUMBER:

CORRECTIVE ACTION COMMENTS: INSTALLATION COMMENT: DPWL has requested funds (1391 process) from DLA that may be used to correct this finding. DPWL is checking the 1391 to determine if funding can be obtained to construct secondary containment.

ST.5.1 #3 III FEDERAL CORRECTIVE ACTION Storage Tanks

FINDING ID: ST-BN-03

MANUAL QUESTION NUMBER: ST-005-001

FINDING CATEGORY: CLASS III

FINDING TYPE: Negative

EXISTING NOV: NO

LOCATION: 108TH ADA 2/43 BN

IFS FACILITY NUMBER: 02942

FACILITY TYPE: MAINTENANCE FACILITIES

FINDING DESCRIPTION: Secondary containment was not provided for 13 fuel tank trucks containing fuel at building #2942 (108th ADA). Trucks are parked upgrade from a storm drain. Any spill or leak could potentially reach the storm drain. No visual evidence indicated that a leak or spill had occurred.

CRITERIA: All bulk storage tanks (over 660 gal [2498 L]) should be provided with a secondary means of containment for the entire contents of the largest single tank plus sufficient freeboard to allow for precipitation (40 CFR 112.1(d), 112.7(d), and 112.7(e)(2)(ii)). Mobile or portable oil storage tanks should be positioned so as to prevent spilled oil from reaching navigable waters and a secondary means of containment should be furnished (40 CFR 112.7(e)(2)(xi)).

FINDING COMMENTS:

STATUS OF CORRECTION: INITIATED/WORK REQUEST SUBMITTED

CORRECTIVE ACTION: Provide secondary containment - Options: 1) Relocate tank trucks to an adequate contained area. Estimated Cost: minimal. 2) Construct impervious containment that will hold the contents of the largest tank, with sufficient freeboard to accommodate precipitation (generally 10% of volume). Estimated Cost: \$20/ft of 6-in concrete berming; \$2/sq ft installed liner for existing berm; \$0.50/sq ft sand bag berm with plastic tarp liner.

CORRECTIVE ACTION TYPE: CORRECTIVE PROJECT

COST: 22

1383 PROJECT NUMBER:

CORRECTIVE ACTION COMMENTS: INSTALLATION COMMENT: An A 106 funding request will be submitted in the spring of 1998. Construct impervious containment.

Polychlorinated Biphenyls

There were no findings associated with this media.

ASBESTOS PROGRAM MANAGEMENT

The Fort Bliss Asbestos Management Program (AMP) is being managed well. However, due to lack of funding, the AMP is not in compliance with AR 200-1. There were two Class III repeat findings with this program. Fort Bliss had not completed a base-wide asbestos building survey that meets the requirement of AR 200-1 and did not have an Asbestos Management Plan that describes the current Operation and Maintenance (O&M) procedures used at Fort Bliss to manage asbestos as required by AR 200-1.

T2.1.3.A #1 III ARMY/DOD CORRECTIVE ACTION Asbestos

FINDING ID: T2-JH-01

MANUAL QUESTION NUMBER: T2-001-003-A

FINDING CATEGORY: CLASS III

FINDING TYPE: Negative

EXISTING NOV: NO

LOCATION: DOE

IFS FACILITY NUMBER: 00515

FACILITY TYPE: REAL ESTATE, SITE IMPROVEMENTS

FINDING DESCRIPTION: Fort Bliss had not completed a base-wide asbestos building survey, that meets the requirements of AR 200-1.

CRITERIA: Installations are required to conduct an asbestos survey of all structures and program and budget resources to identify, manage, and control exposure to asbestos. Periodic surveys are required to be conducted to identify the existence, extent, and condition of all asbestos. As a priority, asbestos surveys are required to be conducted in all housing units and in those buildings which will be renovated, demolished, or transferred from Army use (AR 200-1, Chapter 8, 21 February 1997). Management of paperwork, materials and personnel should be done in a manner that precludes Notices of Violation (NOVs) and addresses systemic weakness in the overall operation of the program.

FINDING COMMENTS: This repeat finding also affects Fort Bliss's Asbestos Management Plan. Without an accurate survey of Fort Bliss's structures, the installation cannot effectively prepare/implement a Special Operations and Maintenance Plan and Asbestos Abatement Plan for the various structures containing asbestos. One office, such as the DOE should be responsible for receiving all documents for asbestos related projects. In conjunction with an Operation and Maintenance (O&M) Plan, this would allow for better tracking of what materials have been removed, and what materials remain.

STATUS OF CORRECTION: NO ACTION YET

CORRECTIVE ACTION: Perform an asbestos building survey that meets the requirements of AR 200-1, Chapter 8. The building survey must identify the location, extent, and condition of all friable and non-friable asbestos. Perform periodic follow-up inspections of buildings per AR 200-1. Estimated Cost: \$2,000,000.

CORRECTIVE ACTION TYPE: OTHERS

COST: 2000000

1383 PROJECT NUMBER:

CORRECTIVE ACTION COMMENTS: INSTALLATION COMMENT: Agree, but the project has never been funded. DOE does not receive funding through environmental channels to complete an asbestos survey.

T2.1.4.A #1 III ARMY/DOD CORRECTIVE ACTION Asbestos

FINDING ID: T2-JH-02

MANUAL QUESTION NUMBER: T2-001-004-A

FINDING CATEGORY: CLASS III

FINDING TYPE: Negative

EXISTING NOV: NO

LOCATION: DOE

IFS FACILITY NUMBER: 00515

FACILITY TYPE: TRAINING BLDGS, RANGES, COURSES, TROOP OPNS

FINDING DESCRIPTION: Fort Bliss did not have an Asbestos Management Plan that describes the current Operation and Maintenance (O&M) procedures used at Fort Bliss to manage asbestos, as required by AR 200-1. It is important for asbestos risk management that the installation know the condition, location, and extent of asbestos in all Department of the Army controlled structures managed by Fort Bliss. Additionally, buildings must be resurveyed periodically to record changes in the condition of the asbestos.

CRITERIA: Installations are required to prepare, coordinate, and execute an Installation Asbestos Management Plan (AR 200-1, para 8-2h, 8-3) [21 February 1997].

FINDING COMMENTS:

STATUS OF CORRECTION: NO ACTION YET

CORRECTIVE ACTION: Prepare and execute an Asbestos Management Plan that describes the operation and maintenance procedures that are used at Fort Bliss as required by AR 200-1, Chapter 8. One office should be responsible for receiving all documents for asbestos related projects. In conjunction with an Operation and Maintenance (O&M) Plan, this would allow for better tracking of what materials have been removed, and what materials remain.

Estimated Cost: \$250,000.

CORRECTIVE ACTION TYPE: OTHERS

COST: 250000

1383 PROJECT NUMBER:

CORRECTIVE ACTION COMMENTS: INSTALLATION COMMENT: Agree, but the project has never been funded. Management plan exists for specific types of materials. DOE does not receive funding through environmental channels to prepare and execute an Asbestos Management Plan. DPWL has never been funded to develop the plan. DOE does receive documents to review for asbestos-related

projects. This review is part of the Installation NEPA compliance.

TRADOC COMMENT: The cost estimate appears to be high for the preparation of a plan. What is the basis of this estimate? Does the asbestos management plan prepared as part of the Fort Bliss agreement to reduce NOVs suffice? Recommend the assessor review and modify this section as appropriate.

Radon

There were no findings associated with this media.

LEAD PROGRAM MANAGEMENT

The Fort Bliss Lead Management Program is being managed well. However, there was one Class III repeat finding. The Directorate of Environment (DOE) did not have a complete written Lead-Based Paint (LBP) Management Program Document, which could locate, evaluate, and manage hazards caused by LBP. The current program document is in draft form and needs to be finalized.

T4.1.3.A #1 III ARMY/DOD CORRECTIVE ACTION Lead Based Paint

FINDING ID: T4-JH-01

MANUAL QUESTION NUMBER: T4-001-003-A

FINDING CATEGORY: CLASS III

FINDING TYPE: Negative

EXISTING NOV: NO

LOCATION: DOE

IFS FACILITY NUMBER: 00515

FACILITY TYPE: REAL ESTATE, SITE IMPROVEMENTS

FINDING DESCRIPTION: The Directorate of Environmental (DOE) did not have a complete written Lead-Based Paint (LBP) Management Program Document which could locate, evaluate, and manage hazards caused by LBP. The current program document is in draft form, and still needs to be finalized.

CRITERIA: Installations should have an LBP management program to identify, assess, manage in-place, remove and dispose of LBP (AR 200-1, Chapter 4-6, 21 February 1997 and DOD LBP Policy Guidance Letter, dated 28 April 1993).

FINDING COMMENTS:

STATUS OF CORRECTION: INITIATED/WORK REQUEST SUBMITTED

CORRECTIVE ACTION: Complete the LBP Management Program Document. Ensure that the document includes procedures for conducting demolition, abatement, renovation, and maintenance work. Also, include procedures for both worker protection and waste characterization of LBP construction debris/waste. Estimated Cost: Minimal.

CORRECTIVE ACTION TYPE: OTHERS

COST: 0

1383 PROJECT NUMBER:

CORRECTIVE ACTION COMMENTS: INSTALLATION COMMENT: In progress.

TRADOC COMMENT: Recommend DOE coordinate with DPW-L concerning the engineering portions of the lead-based paint program.

Wastewater Management

In general, the Fort Bliss wastewater management program met most regulatory requirements. However, there were several areas in need of improvement. There were a few locations found where wastewater was discharged into storm sewers. Several problems were also found at the range sewage lagoons and included: inadequate bar screen maintenance and an overflowing influent channel. Furthermore, there was still a discrepancy about the plans and permits required for the compliant operation of the lagoons. The installation had recently transferred storm water permit coverage from the baseline general permit to the multi-sector general permit (MSGP). However, all compliance requirements of the MSGP had not yet been completed. A final area of concern was compliance with El Paso pretreatment regulations. Clarification of requirements and an expansion of existing sampling programs may be required to ensure compliance with local discharge limits.

WA.3.1 #1 I LOCAL CORRECTIVE ACTION

Wastewater

FINDING ID: WA-KP-01

MANUAL QUESTION NUMBER: WA-003-001

FINDING CATEGORY: CLASS I

FINDING TYPE: Negative

EXISTING NOV: NO

LOCATION: DPWL AVIATION MAINTENANCE FACILITY

IFS FACILITY NUMBER: 11108

FACILITY TYPE: MAINTENANCE FACILITIES

FINDING DESCRIPTION: The aviation maintenance facility at Building 11108 was using a photo-processing machine, which was directly connected to the sanitary sewer system. Although the unit was equipped for silver recovery, it is likely that some amount remains in its effluent. El Paso Public Service Board pretreatment requirements prohibit the discharge of silver compounds into the city collection system.

CRITERIA: Installations/CW facilities are required to comply with state and local wastewater regulations (EO 12088, Section 1-1). The El Paso Water Utilities Rules and Regulations No. 9 prohibit the discharge of mercury and silver compounds into the city collection system.

FINDING COMMENTS: See related finding (WA-KP-12) in regard to pretreatment program compliance requirements.

STATUS OF CORRECTION: INITIATED/WORK REQUEST SUBMITTED

CORRECTIVE ACTION: Collect and analyze a sample from the installation's connection to the city wastewater collection system to determine compliance with El Paso pretreatment requirements. Estimated Cost: minimal. This determination will require notification from the city as to what constitutes an acceptable concentration (e.g. what level is equivalent to "no silver compounds").

CORRECTIVE ACTION TYPE: OTHERS

COST: 0

1383 PROJECT NUMBER:

CORRECTIVE ACTION COMMENTS: INSTALLATION COMMENT: Samples collected during the week of 26 Jan 98. Analytical results expected in early February. DOE will complete corrective action with the El Paso Water Utilities.

WA.3.1 #2 I LOCAL CORRECTIVE ACTION

Wastewater

FINDING ID: WA-KP-12

MANUAL QUESTION NUMBER: WA-003-001

FINDING CATEGORY: CLASS I

FINDING TYPE: Negative

EXISTING NOV: NO

LOCATION: DPWL DOE

IFS FACILITY NUMBER: INST

FACILITY TYPE: ADMINISTRATIVE, COMMUNICATION FACILITIES

FINDING DESCRIPTION: Industrial users of the El Paso wastewater collection system must meet certain requirements. In addition, no mercury or silver compounds may be discharged. Testing at William Beaumont Army Medical Center (WBAMC) facilities has indicated that silver and mercury compounds may be entering the collection system. There are other sources (photo developers) in the Fort Bliss cantonment area which have the potential to discharge these compounds.

CRITERIA: Installations/CW facilities are required to comply with state and local wastewater regulations (EO 12088, Section 1-1). The rules and regulations of the El Paso Public Service Board (Rules and Regulations No. 9) require industrial users to meet certain requirements.

FINDING COMMENTS: A decision will be required on the analytical reporting levels that constitute no discharge of "mercury or silver compounds." A request should be made that results below detection limits (using approved 40 CFR 136 techniques) can be reported as zero. If fence line testing indicates unacceptable pollutant levels, additional pretreatment may be necessary.

STATUS OF CORRECTION: INITIATED/WORK REQUEST SUBMITTED

CORRECTIVE ACTION: Contact the El Paso Public Service Board to determine if the Fort Bliss cantonment area qualifies as an "industrial user" or "significant industrial user." If so designated, baseline and routine monitoring may be required at the connection(s) to the city collection system (Estimated Cost: minimal). Refine the current testing program at the WBAMC facilities to include sample locations at the connection(s) to the city collection system. Estimated Cost: minimal.

CORRECTIVE ACTION TYPE: OTHERS

COST: 0

1383 PROJECT NUMBER:

CORRECTIVE ACTION COMMENTS: INSTALLATION COMMENT: In progress.

WA.3.1.NM #1 I STATE CORRECTIVE ACTION Wastewater

FINDING ID: WA-KP-07

MANUAL QUESTION NUMBER: WA-003-001-NM

FINDING CATEGORY: CLASS I

FINDING TYPE: Negative

EXISTING NOV: NO

LOCATION: SEWAGE LAGOONS (RANGES AND MYER CAMP)

IFS FACILITY NUMBER: LAGOONS

FACILITY TYPE: TRAINING BLDGS, RANGES, COURSES, TROOP OPNS

FINDING DESCRIPTION: Wastewater generated at the three ranges (McGregor, Dona Ana and Oro Grande) and Myer Camp was discharged to lagoons/evaporation ponds. Although a remote possibility, wastewater in these unlined lagoons may have reached groundwater. Discharges to New Mexico groundwater are allowed only after developing a discharge to groundwater plan and obtaining state approval.

CRITERIA: New Mexico Water Quality Control Commission regulations, Part 3, Section 3-100, require facilities which discharge to ground water to submit a plan for the Director's approval.

FINDING COMMENTS: Directorate of Environment personnel are in the process of developing the necessary discharge to ground water plans.

STATUS OF CORRECTION: INITIATED/WORK REQUEST SUBMITTED

CORRECTIVE ACTION: Develop and submit for state approval the required discharge to groundwater plan. Estimated Cost: minimal.

CORRECTIVE ACTION TYPE: OTHERS

COST: 0

1383 PROJECT NUMBER:

CORRECTIVE ACTION COMMENTS: INSTALLATION: Latest drilling investigation results: Don Ana pond-depth to groundwater (GW) = 320 ft; McGregor pond-drilled to 350 ft with no GW under lagoon to that depth; Oro Grande pond-bedrock encountered at 320 ft with no GW under lagoon.

USACHPPM COMMENT: Discharge to GW Plans: There does not appear to be a "reasonable potential" to reach groundwater. The criteria is the basis for the inclusion/exclusion of pollutants on a NPDES permit. It seems reasonable that the same logic applies in this situation. Without a connection between the lagoons and GW, a discharge to GW plan is technically unnecessary. A non-

confrontational letter for the NM regulators should be drafted for the Garrison Commander's (GC) signature which describes this position and includes the drilling logs as supporting documentation. This will eliminate the GW concerns for these lagoons. They may be regulated under a non-water statute, depending on the types of non-human wastes (RCRA) if any, they have received.

Surface Water Discharge: Since the McGregor Range lagoon has an overland discharge, and will continue to have one for the foreseeable future, it likely requires a NPDES permit. The wetland created could now be considered a United States surface water requiring permits for discharges into it. The well data does not affect this requirement or the related ECAS finding. Fort Bliss should obtain EPA-Region VI clarification on the NPDES permit requirements for the McGregor lagoon.

WA.10.1 #1 I FEDERAL CORRECTIVE ACTION Wastewater

FINDING ID: WA-KP-02

MANUAL QUESTION NUMBER: WA-010-001

FINDING CATEGORY: CLASS I

FINDING TYPE: Negative

EXISTING NOV: NO

LOCATION: DPWL AVIATION MAINTENANCE

IFS FACILITY NUMBER: 11108

FACILITY TYPE: MAINTENANCE FACILITIES

FINDING DESCRIPTION: Helicopter engines are cleaned with jet path cleaner and flushed with water on the tarmac in front of the hangar. The discharge from this process could enter a nearby storm drain.

CRITERIA: Installations/CW facilities with point source discharges are required to have either a State NPDES or a Federal NPDES permit if located in states without an USEPA approved NPDES permit program (40 CFR 122.1(b)(3)) [May 1996].

FINDING COMMENTS:

STATUS OF CORRECTION: INITIATED/WORK REQUEST SUBMITTED

CORRECTIVE ACTION: Ensure the jet path cleaning operation is conducted in an area of the facility where there is no possibility for the discharge to enter storm drains. Estimated Cost: minimal. The reportedly small volume of process effluent (5-10 gallons) should easily evaporate prior to discharge if the cleaning is conducted away from any storm drains.

CORRECTIVE ACTION TYPE: OPERATIONAL OR PROCEDURAL CHANGE

COST: 0

1383 PROJECT NUMBER:

CORRECTIVE ACTION COMMENTS: INSTALLATION COMMENT: DPWL personnel are developing an SOP for cleaning engines at the Aviation Maintenance facility. The SOP will prohibit cleaning operations in the vicinity of storm drains.

WA.10.1 #2 I FEDERAL CORRECTIVE ACTION Wastewater

FINDING ID: WA-KP-03

MANUAL QUESTION NUMBER: WA-010-001

FINDING CATEGORY: CLASS I

FINDING TYPE: Negative

EXISTING NOV: NO

LOCATION: 2/43 108TH ADA

IFS FACILITY NUMBER: 02423

FACILITY TYPE: TRAINING BLDGS, RANGES, COURSES, TROOP OPNS

FINDING DESCRIPTION: Personnel were cleaning a portable, diesel powered, electric generator with a steam cleaner on the gravel parking lot in front of the building.

CRITERIA: Installations/CW facilities with point source discharges are required to have either a State National Pollutant Discharge Elimination System (NPDES) or a Federal NPDES permit if located in states without an USEPA approved NPDES permit program (40 CFR 122.1(b)(3)) [May 1996].

FINDING COMMENTS:

STATUS OF CORRECTION: COMPLETE

CORRECTIVE ACTION: Ensure all steam cleaning operations are conducted at a washrack which is connected to the sanitary sewer and equipped with an oil/water separator. Estimated Cost: minimal.

CORRECTIVE ACTION TYPE: OPERATIONAL OR PROCEDURAL CHANGE

COST: 0

1383 PROJECT NUMBER:

CORRECTIVE ACTION COMMENTS: Corrective action completed.

WA.10.1 #3 I FEDERAL CORRECTIVE ACTION Wastewater

FINDING ID: WA-KP-04
MANUAL QUESTION NUMBER: WA-010-001
FINDING CATEGORY: CLASS I
FINDING TYPE: Negative EXISTING NOV: NO
LOCATION: RAYTHEON MAINTENANCE FACILITY
IFS FACILITY NUMBER: 11005
FACILITY TYPE: MAINTENANCE FACILITIES

FINDING DESCRIPTION: Various types of vehicles and equipment were steam cleaned in an area outside the hangar. The discharge from this process was directed to an adjacent storm sewer.

CRITERIA: Installations/CW facilities with point source discharges are required to have either a State NPDES or a Federal NPDES permit if located in states without an USEPA approved NPDES permit program (40 CFR 122.1(b)(3)) [May 1996].

FINDING COMMENTS:

STATUS OF CORRECTION: COMPLETE

CORRECTIVE ACTION: (1) Ensure this cleaning operation takes place at an existing wash rack area. Estimated Cost: minimal.
(2) Construct an appropriate wash rack at this location that is equipped with an oil/water separator and connected to the sanitary sewer. Estimated Cost: \$15,000. In either case, soap or solvents should not be allowed.

CORRECTIVE ACTION TYPE: OPERATIONAL OR PROCEDURAL CHANGE
COST: 15000
1383 PROJECT NUMBER:

CORRECTIVE ACTION COMMENTS: Cleaning operation will be performed at existing wash rack. Corrective action completed.

WA.10.1 #4 I FEDERAL CORRECTIVE ACTION Wastewater

FINDING ID: WA-KP-05

MANUAL QUESTION NUMBER: WA-010-001

FINDING CATEGORY: CLASS I

FINDING TYPE: Negative

EXISTING NOV: NO

LOCATION: C CO. 204TH MI BN

IFS FACILITY NUMBER: 11108

FACILITY TYPE: MAINTENANCE FACILITIES

FINDING DESCRIPTION: Fixed wing aircraft and engines were steam cleaned inside the hangar and the discharge entered a drain which appeared to be a storm sewer connection.

CRITERIA: Installations/CW facilities with point source discharges are required to have either a State NPDES or a Federal NPDES permit if located in states without an USEPA approved NPDES permit program (40 CFR 122.1(b)(3)) [May 1996].

FINDING COMMENTS: A wash rack facility constructed at this location could also be used for jet engine cleaning which takes place in front of this hangar (see finding WA-KP-02).

STATUS OF CORRECTION: INITIATED/WORK REQUEST SUBMITTED

CORRECTIVE ACTION: Construct a wash rack for this facility which is equipped with a properly sized oil/water separator and connected to the sanitary sewer. Estimated Cost: \$15,000.

CORRECTIVE ACTION TYPE: CORRECTIVE PROJECT

COST: 15000

1383 PROJECT NUMBER:

CORRECTIVE ACTION COMMENTS: DPWL has funding to upgrade aircraft cleaning facilities and DOE is working with Public Works to build a wash rack at Bldg# 11108. In the meantime, vehicle cleaning near the drain has been suspended.

WA.10.1 #5 I FEDERAL CORRECTIVE ACTION Wastewater

FINDING ID: WA-KP-06

MANUAL QUESTION NUMBER: WA-010-001

FINDING CATEGORY: CLASS I

FINDING TYPE: Negative

EXISTING NOV: NO

LOCATION: AUTO CRAFT SHOP

IFS FACILITY NUMBER: 00820

FACILITY TYPE: HOUSING & COMMUNITY FACILITIES

FINDING DESCRIPTION: An oil/water separator at the auto craft shop connected to the reportedly closed washracks had overflowed. A considerable amount of oily wastewater discharged across the parking lot and into an adjacent drainage ditch. It was reported that a nearby sanitary sewer manhole was opened during the overflow and some of the wastewater was directed into it.

CRITERIA: Installations/CW facilities with point source discharges are required to have either a State NPDES or a Federal NPDES permit if located in states without an USEPA approved NPDES permit program (40 CFR 122.1(b)(3)) [May 1996].

FINDING COMMENTS: The floor drains inside the auto craft shop are connected to the oil/water separator. These floor drains should be the only source of oily wastewater if the wash racks are indeed closed. Limiting wet cleaning of the shop floors should reduce the load on the separator.

STATUS OF CORRECTION: COMPLETE

CORRECTIVE ACTION: Provide for the routine inspection, maintenance and cleaning of the facilities oil/water separator.
Estimated Cost: \$6,000.

CORRECTIVE ACTION TYPE: OPERATIONAL OR PROCEDURAL CHANGE

COST: 6000

1383 PROJECT NUMBER:

CORRECTIVE ACTION COMMENTS: Craft Shop personnel cleaned out the separator. DOE inspectors will check the OWS quarterly during hazardous waste inspections to ensure regular maintenance.

WA.10.1 #6 I FEDERAL CORRECTIVE ACTION Wastewater

FINDING ID: WA-KP-08
MANUAL QUESTION NUMBER: WA-010-001
FINDING CATEGORY: CLASS I
FINDING TYPE: Negative EXISTING NOV: NO
LOCATION: MCGREGOR RANGE BASE CAMP
IFS FACILITY NUMBER: LAGOON
FACILITY TYPE: TRAINING BLDGS, RANGES, COURSES, TROOP OPNS

FINDING DESCRIPTION: The amount of wastewater generated at the McGregor range base camp exceeds the design capacity of the wastewater lagoon and causes it to continuously discharge. It is possible that the effluent stream or the area it travels through could be considered a water body requiring NPDES permits for discharges into it.

CRITERIA: Installations/CW facilities with point source discharges are required to have either a State NPDES or a Federal NPDES permit if located in states without an USEPA approved NPDES permit program (40 CFR 122.1(b)(3)) [May 1996].

FINDING COMMENTS:

STATUS OF CORRECTION: INITIATED/WORK REQUEST SUBMITTED
CORRECTIVE ACTION: Obtain clarification from EPA Region VI on the applicability of NPDES requirements for the McGregor Range sewage lagoon. Apply lagoon in series for NPDES permit coverage if necessary and prepare for any required routine monitoring.
Estimated Cost: minimal.

CORRECTIVE ACTION TYPE: ADMINISTRATIVE OR POLICY CHANGE

COST: 0

1383 PROJECT NUMBER:

CORRECTIVE ACTION COMMENTS: INSTALLATION COMMENT: DOE will work with the EPA to determine and implement NPDES requirements.

WA.10.1 #7 I FEDERAL CORRECTIVE ACTION Wastewater

FINDING ID: WA-KP-10

MANUAL QUESTION NUMBER: WA-010-001

FINDING CATEGORY: CLASS I

FINDING TYPE: Negative

EXISTING NOV: NO

LOCATION: ORO GRANDE RANGE

IFS FACILITY NUMBER: LAGOON

FACILITY TYPE: TRAINING BLDGS, RANGES, COURSES, TROOP OPNS

FINDING DESCRIPTION: The influent pipe to the Oro Grande lagoon was clogged and raw wastewater was discharging to the ground and into an intermittent stream.

CRITERIA: Installations/CW facilities with point source discharges are required to have either a State NPDES or a Federal NPDES permit if located in states without an USEPA approved NPDES permit program (40 CFR 122.1(b)(3)) [May 1996].

FINDING COMMENTS:

STATUS OF CORRECTION: COMPLETE

CORRECTIVE ACTION: Provide for the routine maintenance of the lagoon grit chamber and jet rod the influent pipe. Estimated Cost: minimal.

CORRECTIVE ACTION TYPE: OPERATIONAL OR PROCEDURAL CHANGE

COST: 0

1383 PROJECT NUMBER:

CORRECTIVE ACTION COMMENTS: INSTALLATION COMMENT: The pipe was cleared but should be upgraded. At this time, there is no funding to replace the influent pipe. Corrective action corrected at present.

WA.10.3 #1 II FEDERAL CORRECTIVE ACTION Wastewater

FINDING ID: WA-KP-11

MANUAL QUESTION NUMBER: WA-010-003

FINDING CATEGORY: CLASS II

FINDING TYPE: Negative

EXISTING NOV: NO

LOCATION: DPWL DOE

IFS FACILITY NUMBER: 00624

FACILITY TYPE: ADMINISTRATIVE, COMMUNICATION FACILITIES

FINDING DESCRIPTION: The installation has recently transferred NPDES storm water permit coverage from the expired baseline general permit to the existing multi-sector general permit (MSGP). Coverage under the MSGP will require several modifications to the storm water program.

CRITERIA: Installations/CW facilities which are dischargers of stormwater associated with an industrial activity (see definitions) are required to apply for an individual permit, apply for a permit through a group application, or seek coverage under a promulgated stormwater general permit (40 CFR 122.26(c) and 122.26(g)) [May 1996].

FINDING COMMENTS:

STATUS OF CORRECTION: INITIATED/WORK REQUEST SUBMITTED

CORRECTIVE ACTION: Coverage under the MSGP requires the following: 1. Modification and upgrade of the Storm Water Pollution Prevention Plan by February 17, 1998 (Estimated Cost: \$20,000) 2. Quarterly storm water sampling for FY 1998 (Estimated Cost: \$10,000). 3. Quarterly visual inspections (Estimated Cost: minimal). 4. Implementation of construction best management practices (BMPs) by 29 September 1998 (Estimated Cost: unknown, dependent on number and extent of required BMPs).

CORRECTIVE ACTION TYPE: OTHERS

COST: 30000

1383 PROJECT NUMBER:

CORRECTIVE ACTION COMMENTS: INSTALLATION COMMENT: Storm Water Pollution Prevention Plan will be completed in February 1998. Implementation Guide for BMP's will be finished in March and implementation of construction BMP's will follow in June 1998.

WA.21.2.NM #1 III STATE CORRECTIVE ACTION Wastewater

FINDING ID: WA-KP-09

MANUAL QUESTION NUMBER: WA-021-002-NM

FINDING CATEGORY: CLASS III

FINDING TYPE: Negative

EXISTING NOV: NO

LOCATION: MCGREGOR RANGE BASE CAMP

IFS FACILITY NUMBER: LAGOON

FACILITY TYPE: TRAINING BLDGS, RANGES, COURSES, TROOP OPNS

FINDING DESCRIPTION: The bar screen located in the influent channel to the sewage lagoon was not properly maintained. Trash and debris removed from the influent was covering the bar screen and the surrounding area.

CRITERIA: Maintenance of public wastewater systems at Installations/CW facilities must meet specific requirements (20 NMAC 7.4, 200 (d)).

FINDING COMMENTS:

STATUS OF CORRECTION: INITIATED/WORK REQUEST SUBMITTED

CORRECTIVE ACTION: Provide for the routine maintenance of the bar screen at the sewage lagoon. Estimated Cost: minimal.

CORRECTIVE ACTION TYPE: OPERATIONAL OR PROCEDURAL CHANGE

COST: 0

1383 PROJECT NUMBER:

CORRECTIVE ACTION COMMENTS: INSTALLATION COMMENT: DOE is developing an SOP for implementation by DPWL range camps personnel.

WATER QUALITY MANAGEMENT

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Fort Bliss operates a public drinking water system in three areas in Texas: Fort Bliss Main Post, the Site Monitor, and Biggs Army Airfield; and one area in New Mexico: Dona Ana Range Camp. Fort Bliss also provides support to the McGregor Range Camp in New Mexico which purchases their water from the City of El Paso, classified as a consecutive water system, and the Oro Grande Range Camp in New Mexico which receives their water from White Sands Missile Range. All systems use groundwater as their source and add chlorine for treatment. Each system must conduct its own regulatory drinking water monitoring.

Five Class I Findings were written. The Class I findings dealt with no operation permit for three water systems in New Mexico, lack of a cross-connection control program, repairing the reservoir (NOV), inspecting storage tanks, and maintaining records. There was a total of two Class III findings: no written emergency/contingency plan and distribution system flushing plan.

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The Preventive Medicine Service (PVNTMED Svc) at William Beaumont Army Medical Center (WBAMC) currently performs the bacteriological monitoring and record keeping requirements for the installation and range camps. The PVNTMED Svc man-power, will be downsized in February 1998. With this shortage of man-power, there is a potential that PVNTMED Svc can not perform the bacteriological monitoring/sampling requirements for the installation. Since the Directorate of Environment (DOE) has the overall responsibility to meet the Texas Natural Resource Conservation Commission (TNRCC) monitoring requirements, they should start investigating other alternatives to comply with the bacteriological sampling. The DOE, Directorate of Public Works and Logistics (DPWL) and PVNTMED Svc should get together to resolve this issue.

WQ.3.1 #1 I STATE CORRECTIVE ACTION

Water Quality

FINDING ID: WQ-KS-02

MANUAL QUESTION NUMBER: WQ-003-001

FINDING CATEGORY: CLASS I

FINDING TYPE: Negative

EXISTING NOV: NO

LOCATION: DOE

IFS FACILITY NUMBER: MULT

FACILITY TYPE: UTILITIES & GROUND IMPROVEMENTS

FINDING DESCRIPTION: Dona Ana, McGregor, and Oro Grande Range Camps, located in New Mexico, do not currently have operation permits from the New Mexico Environmental Department (NMED).

CRITERIA: Installations/CW facilities are required to comply with state and local water quality regulations (EO 12088, Section 1-1 and 42 USC 300h-7(h)). All public water supply system projects must be approved in writing by the NMED (20 NMAC 7.1,501).

FINDING COMMENTS: Dona Ana Range camp has two wells, more than 15 service connections, and serves more than 25 people at least 60-days per year, qualifying it as a public water system. McGregor Range camp purchases water from El Paso and provides retreatment (re-chlorination) and therefore, is to be considered a consecutive water supplier under New Mexico regulation. There has been correspondence with the NMED regarding this issue, however, the outcome is unclear. Oro Grande Range camp receives water from White Sands Missile Range, it has more than 15 service connections, and provides re-chlorination, therefore it qualifies as a public water system.

STATUS OF CORRECTION: INITIATED/WORK REQUEST SUBMITTED

CORRECTIVE ACTION: Submit permit applications to the NMED for all three Range camp systems. Estimated Cost: \$1,500.

CORRECTIVE ACTION TYPE: ADMINISTRATIVE OR POLICY CHANGE

COST: 1500

1383 PROJECT NUMBER:

CORRECTIVE ACTION COMMENTS: INSTALLATION COMMENT: DOE is awaiting analysis from DERA drilling project and will then apply for groundwater and stormwater permits.

WQ.10.2.TX #1 I STATE CORRECTIVE ACTION Water Quality

FINDING ID: WQ-KS-08

MANUAL QUESTION NUMBER: WQ-010-002-TX

FINDING CATEGORY: CLASS I

FINDING TYPE: Negative

EXISTING NOV: NO

LOCATION: DPWL

IFS FACILITY NUMBER: INST

FACILITY TYPE: UTILITIES & GROUND IMPROVEMENTS

FINDING DESCRIPTION: Detailed inspection of storage tanks had not occurred since 1995. The Texas Natural Resource Conservation Commission (TNRCC) requires that all storage tanks be inspected annually and records of inspection be kept for a minimum of 5 years.

CRITERIA: Public drinking water systems must meet specific operating requirements (30 TAC, Section 290.44(a)(4), 290.46(1), (n) through (q), and (t) through (w)) [Revised June 1997]. Ground and elevated storage tanks must be inspected annually [30 TAC, Chapter 290.46 (p) (1)].

FINDING COMMENTS: Distribution system operators currently perform periodic inspections covering some, but not all, requirements. Work orders had been filed to let an annual contract for inspection of all storage facilities (WO #FE011706J960212 BAAF; #FE011716J960212 Bliss; #FE011726J960212 Site Monitor; and #FE011746J960212 Range Camp Systems).

STATUS OF CORRECTION: NO ACTION YET

CORRECTIVE ACTION: Develop recurring annual contracts for inspection of all storage facilities in accordance with TNRCC requirements. Estimated Cost: \$10,000.

CORRECTIVE ACTION TYPE: OTHERS

COST: 10000

1383 PROJECT NUMBER:

CORRECTIVE ACTION COMMENTS: INSTALLATION COMMENT: DOE has 2 certified divers. The inspections can currently be done in-house with rented equipment. There is no funding to initiate this corrective action.

WQ.10.2.TX #2 I STATE CORRECTIVE ACTION Water Quality

FINDING ID: WQ-KS-01

MANUAL QUESTION NUMBER: WQ-010-002-TX

FINDING CATEGORY: CLASS I

FINDING TYPE: Negative

EXISTING NOV: YES

LOCATION: DPWL

IFS FACILITY NUMBER: 01318

FACILITY TYPE: UTILITIES & GROUND IMPROVEMENTS

FINDING DESCRIPTION: The potable water storage reservoir at Fort Bliss Main Post (Bldg# 1318) is leaking. Pooling rainwater on top of the reservoir is infiltrating into the reservoir. In addition, water is seeping through a wall of the reservoir into the computer room in building #1318.

CRITERIA: Public drinking water systems must meet specific operating requirements (30 TAC, Section 290.44(a)(4), 290.46(1), (n) through (q), and (t) through (w)) [Revised June 1997]. Clear wells and potable water storage tanks shall be thoroughly tight against leakage [TAC 30, Section 290.43 (c) (6)].

FINDING COMMENTS: The State of Texas issued a Notice of Violation (NOV) for this facility on 29 April 1994. The NOV states "this facility must be repaired or replaced". The Texas Historical Society has declared the existing facility and attached building #1318, to be a historical site and as a result any new construction must be identical in appearance to the existing facility. Engineering design plans already exist for a replacement structure but the project is awaiting funding. Memorandum of Agreement (MOA) exist to mitigate.

STATUS OF CORRECTION: NO ACTION YET

CORRECTIVE ACTION: Develop a 1391 packet for construction/repair the storage tank. The leaking reservoir must be repaired or replaced. There are three reservoirs. Estimated Cost: \$1,000,000 each reservoir.

CORRECTIVE ACTION TYPE: CORRECTIVE PROJECT

COST: 3000000

1383 PROJECT NUMBER:

CORRECTIVE ACTION COMMENTS: INSTALLATION COMMENT: DPWL will prepare the 1391 packet and DOE will add comments in the narrative section.

WQ.10.13.TX #1 I STATE CORRECTIVE ACTION Water Quality

FINDING ID: WQ-KS-06

MANUAL QUESTION NUMBER: WQ-010-013-TX

FINDING CATEGORY: CLASS I

FINDING TYPE: Negative

EXISTING NOV: NO

LOCATION: DPWL

IFS FACILITY NUMBER: INST

FACILITY TYPE: UTILITIES & GROUND IMPROVEMENTS

FINDING DESCRIPTION: According to personnel, Fort Bliss did not have a cross-connection control and backflow prevention program. A contract was currently in place to develop a cross-connection control and backflow prevention program. The Directorate of Public Works and Logistics (DPWL) personnel are trained to inspect and test backflow prevention devices and currently have equipment necessary to perform this function.

CRITERIA: Public water supply systems must protect against cross or interconnections (30 TAC, Section 290.46(i) through (k)).

FINDING COMMENTS: Measures had already been taken by DPWL and a contractor to formulate and implement a cross-connection control and backflow prevention program. The contractor just begun the building survey to identify existing backflow prevention devices and identify all locations which required backflow prevention devices. Testing of the existing backflow prevention devices will not be done during this stage. The contracted project that is currently underway to correct this problem is scheduled to be completed by the year 2003.

STATUS OF CORRECTION: INITIATED/WORK REQUEST SUBMITTED

CORRECTIVE ACTION: Continue execution of the existing contract for a cross-connection control program. Conduct a survey of all installation buildings to identify/test existing backflow prevention devices and identify all locations which required backflow prevention devices. Estimated Cost: \$100,000. The results of this survey will determine the type and amount of backflow prevention devices required. Estimated Cost: \$100-15,000 per device, depending on type/size. Annual operation and maintenance for these devices will cost about 50,000/year.

CORRECTIVE ACTION TYPE: OPERATIONAL OR PROCEDURAL CHANGE

COST: 165000

1383 PROJECT NUMBER:

CORRECTIVE ACTION COMMENTS: INSTALLATION COMMENTS: The survey will be 50% complete by August 1998. In progress.

WQ.30.1.TX #1 I STATE CORRECTIVE ACTION Water Quality

FINDING ID: WQ-KS-04

MANUAL QUESTION NUMBER: WQ-030-001-TX

FINDING CATEGORY: CLASS I

FINDING TYPE: Negative

EXISTING NOV: NO

LOCATION: DOE

IFS FACILITY NUMBER: 00515

FACILITY TYPE: UTILITIES & GROUND IMPROVEMENTS

FINDING DESCRIPTION: Copies of chemical analysis monitoring for all Fort Bliss water systems for years prior to 1993, were not available for review. There is a requirement to maintain these records for a minimum of 10 years.

CRITERIA: Public water systems must meet specific recordkeeping and reporting requirements (30 TAC, Section 290.112). Specifically, chemical records must be maintained for 10 years.

FINDING COMMENTS:

STATUS OF CORRECTION: INITIATED/WORK REQUEST SUBMITTED

CORRECTIVE ACTION: Contact the Texas Natural Resources Conservation Commission (TNRCC) for copies of old records.
Estimated Cost: \$0.

CORRECTIVE ACTION TYPE: ADMINISTRATIVE OR POLICY CHANGE

COST: 0

1383 PROJECT NUMBER:

CORRECTIVE ACTION COMMENTS: INSTALLATION COMMENTS: Corrective action in progress.

WQ.15.2.TX #1 II STATE CORRECTIVE ACTION Water Quality

FINDING ID: WQ-RV-09

MANUAL QUESTION NUMBER: WQ-015-002-TX

FINDING CATEGORY: CLASS II

FINDING TYPE: Negative

EXISTING NOV: NO

LOCATION: PVNTMED SVC

IFS FACILITY NUMBER: 00118

FACILITY TYPE: UTILITIES & GROUND IMPROVEMENTS

FINDING DESCRIPTION: The Preventive Medicine Service (PVNTMED Svc) at William Beaumont Army Medical Center (WBAMC) currently performs the bacteriological monitoring and record keeping requirements for the installation and range camps. The PVNTMED Svc manpower will be downsized in February 1998. With this shortage of manpower, there is a potential that PVNTMED Svc can not perform the bacteriological monitoring/sampling requirements for the installation.

CRITERIA: Public water systems must determine compliance with the MCL for microbiological contaminants (30 TAC, Sections 290.105 and 290.106(a)).

FINDING COMMENTS: Since the Directorate of Environment (DOE) has the overall responsibility to meet the Texas Natural Resource Conservation Commission (TNRCC) monitoring requirements at the installation, they should start investigating other alternatives to comply with the bacteriological sampling. The DOE, Directorate of Public Works and Logistics (DPWL) and PVNTMED Svc should get together to resolve this issue.

STATUS OF CORRECTION: INITIATED/WORK REQUEST SUBMITTED

CORRECTIVE ACTION: (1) Provide or hire a civilian technician to help run both PVNTMED Svc's bacteriological laboratory and the Installation water-monitoring program. This would help resolve the Texas Department of Health's concern regarding frequent laboratory personnel turnover. Keeping the laboratory under PVNTMED Svc's control would allow the program to retain the current flexibility and high level of service at a reasonable cost. Estimated Cost: \$25,000 yearly salary. (2) Another alternative is to contract out the installation's bacteriological monitoring/sampling program. Estimated Cost: \$20,000 annually.

CORRECTIVE ACTION TYPE: OTHERS

COST: 25000

1383 PROJECT NUMBER:

CORRECTIVE ACTION COMMENTS: INSTALLATION COMMENT: A Memo of Agreement is being developed between PM, DPWL, DOE, PA, and the Garrison Command. Current staffing is adequate for fiscal year 1998.

WQ.1.5.A #1 III ARMY/DOD CORRECTIVE ACTION Water Quality

FINDING ID: WQ-KS-05

MANUAL QUESTION NUMBER: WQ-001-005-A

FINDING CATEGORY: CLASS III

FINDING TYPE: Negative

EXISTING NOV: NO

LOCATION: DPWL

IFS FACILITY NUMBER: INST

FACILITY TYPE: UTILITIES & GROUND IMPROVEMENTS

FINDING DESCRIPTION: According to Fort Bliss personnel, the installation does not have a written, working plan for emergency contingencies concerning the water systems.

CRITERIA: Installations are required to have an Standard Operating Procedure (SOP) for alerting personnel in national or local emergencies or times of actual or anticipated noncompliance (AR 420-49, para 4-3a).

FINDING COMMENTS: This SOP will serve as a guide in addressing actual or potential drinking water contamination or shortages. This SOP should address emergencies such as floods, hurricanes, drought, severe contamination of the water source and systems, and list each person's responsibilities, actions, and personnel to contact. Also, included in the SOP, alternate water sources that can be used in emergencies. Excellent guidance is available via the State of Washington publications, Emergency Planning Instructional Guide, and the Emergency Planning Workbook and American Water Works Manual M19. Measures had already been taken by the Directorate of Environment and a contractor to develop the written drinking water emergency SOP (scheduled to be completed September 1998). Each person/office with emergency responsibilities should have a copy of the plan readily available and the SOP should be tested on a periodic basis to confirm that the planned procedures will remedy the situation in an effective manner.

STATUS OF CORRECTION: INITIATED/WORK REQUEST SUBMITTED

CORRECTIVE ACTION: Develop written drinking water emergency SOP.
Estimated Cost: \$10,000.

CORRECTIVE ACTION TYPE: OTHERS

COST: 10000

1383 PROJECT NUMBER:

CORRECTIVE ACTION COMMENTS: INSTALLATION COMMENTS: DOE is developing the SOP in conjunction with other water projects. Corrective action in progress.

WQ.2.1.A #1 III ARMY/DOD CORRECTIVE ACTION Water Quality

FINDING ID: WQ-KS-07

MANUAL QUESTION NUMBER: WQ-002-001-A

FINDING CATEGORY: CLASS III

FINDING TYPE: Negative

EXISTING NOV: NO

LOCATION: DPWL

IFS FACILITY NUMBER: INST

FACILITY TYPE: UTILITIES & GROUND IMPROVEMENTS

FINDING DESCRIPTION: Although sections of the water distribution system are periodically flushed based on consumer complaint, the installation does not have an effective comprehensive program for flushing the distribution system.

CRITERIA: Water distribution system flushing shall be performed on an annual basis according to a written plan (AR 420-49, TB MED 576, paragraph 4-3b).

FINDING COMMENTS:

STATUS OF CORRECTION: NO ACTION YET

CORRECTIVE ACTION: Develop and implement a written comprehensive flushing program for the potable water distribution system in accordance with TM 5-660. The plan should address the following: systematic flushing of the distribution system from water supply entry points outward to the extremities of the distribution system; documentation of flushing events; and reason for flushing. Comprehensive flushing of the entire distribution system should be conducted at least annually. Estimated cost of plan: \$8,000.

CORRECTIVE ACTION TYPE: OTHERS

COST: 8000

1383 PROJECT NUMBER:

CORRECTIVE ACTION COMMENTS: INSTALLATION COMMENT: DOE will write the plan in conjunction with ongoing projects.

APPENDIX A
GLOSSARY OF ACRONYMS

AAF	Army Airfield
AAFES	U.S. Army & Air Force Exchange System
ACM	Asbestos Containing Material
ADA	Air Defense Artillery
AR	Army Regulation
ARPA	Archaeological Resources Protection Act
AST	Aboveground Storage Tank
AVN	Aviation
BASOPS	Base Operations
BDE	Brigade
BLM	Bureau of Land Management
BN	Battalion
BRAC	Base Realignment and Closure
CAA	Clean Air Act
CAV	Cavalry
CERCLA	Comprehensive Environmental Response, Compensation, and Liability Act
CERL	U.S. Army Construction Engineering Research Laboratory
CFC	Chlorofluorocarbon
CFR	Code of Federal Regulations
CG	Commanding General
CO	Company
CPO	Civilian Personnel Office
CWA	Clean Water Act
DA	Department of Army
DCFA	Directorate of Community & Family Activities
DECA	Defense Commissary
DERA	Defense Environmental Restoration Account
DET	Detachment
DFSP	Defense Fuel Supply Point
DFR	Draft Findings Report
DOD	Department of Defense
DOIM	Directorate of Information Management
DOT	Department of Transportation
DPS	Defense Printing Service
DPTSM	Directorate of Plans, Training, Security, & Mobilization
DPWL	Directorate of Public Works and Logistics
DRMO	Defense Reutilization and Marketing Office
EA	Environmental Assessment
ECAR	Environmental Compliance Assessment Report
ECAS	Environmental Compliance Assessment System
ECS	Equipment Concentration Site
ED	Environmental Department

EIS	Environmental Impact Statement
ENGR	Engineer
EO	Executive Order
EOD	Explosive Ordnance Demolition
EPA	U.S. Environmental Protection Agency
EPCRA	Emergency Planning Community Right-to-Know Act
EQCC	Environmental Quality Control Committee
ESA	Endangered Species Act
FA	Field Artillery
FFA	Federal Facility Agreement
FFCA	Federal Facilities Compliance Act
FFID	Federal Facility Identification Number
FIFRA	Federal Insecticide, Fungicide, and Rodenticide Act
FONSI	Finding of No Significant Impact
FOTW	Federally-Owned Treatment Works
FRP	Facility Response Plan
GAF	German Air Force
GIS	Geographic Information System
GMP	Good Management Practice
GSA	General Services Administration
HAZCOM	Hazard Communication
HAZMIN	Hazardous Waste Minimization
HM	Hazardous Materials
HPP	Historic Preservation Plan
HQDA	Headquarters Department of the Army
HW	Hazardous Waste
H/S	Health and Safety
ICAP	Installation Corrective Action Plan
ICUZ	Installation Compatible Use Zone
IFS	Integrated Facility System
IG	Inspector General
INF	Infantry
INRMP	Integrated Natural Resources Management Plan
INST	Installation
IPMC	Installation Pest Management Coordinator
IPMP	Installation Pest Management Plan
IRP	Installation Restoration Program
ISCP	Installation Spill Contingency Plan
ISSA	Installation Service Support Agreement
ITAM	Integrated Training Area Management
LBP	Lead-Based Paint
LEC	Law Enforcement Command
MACOM	Major Command
MEDCOM	U.S. Army Medical Command
MEDDAC	Medical Activity
MI	Military Intelligence
MOA	Memorandum of Agreement

MOGAS	Motor Gasoline
MOI	Memorandum of Instruction
MP	Management Practice
MSDS	Material Safety Data Sheet
MSWLF	Municipal Solid Waste Landfill
MULT	Multiple
NEPA	National Environmental Policy Act
NHPA	National Historic Preservation Act
NMAQCR	New Mexico Air Quality Control Regulations
NMWSR	New Mexico Water Standards Regulations
NOV	Notice of Violation
NPDES	National Pollutant Discharge and Elimination System
NR	Natural Resource
NSN	National Stock Number
OB/OD	Open Burning/Open Detonation
OSHA	Occupational Safety and Health Administration
OWS	Oil Water Separator
PAO	Public Affairs Office
PCB	Polychlorinated Biphenyls
POC	Point of Contact
POL	Petroleum, Oils, and Lubricants
POTW	Publicly-Owned Treatment Works
ppm	parts per million
PVNTMED	Preventive Medicine
PX	Post Exchange
QA	Quality Assurance
QC	Quality Control
QRP	Qualifying Recycling Program
RCRA	Resource Conservation and Recovery Act
REC	Record of Environmental Consideration
RFA	RCRA Facility Assessment
RMW	Regulated Medical Waste
RRRP	Resource Recovery and Recycling Program
SARA	Superfund Amendments and Reauthorization Act
SDWA	Safe Drinking Water Act
SH	Substantial Harm
SHPO	State Historic Preservation Office
SIG	Signal
SJA	Staff Judge Advocate
SOP	Standing Operating Procedure
SPCCP	Spill Prevention, Control, and Countermeasure Plan
STP	Sewage Treatment Plant
SVOC	Semivolatile Organic Compound
SWMU	Solid Waste Management Unit
SWPPP	Storm Water Pollution Prevention Plan
TA	Training Area
TAC	Texas Authority Code

TB	Technical Bulletin
TCLP	Toxicity Characteristic Leaching Procedure
TEAM	The Environmental Assessment and Management
TMP	Transportation Motor Pool
TNRCC	Texas Natural Resource Conservation Commission
TRI	Toxic Release Inventory
TSC	Training Support Center
TSCA	Toxic Substances Control Act
TSDF	Treatment, Storage and/or Disposal Facility
TWC	Texas Water Commission
USAADAC	U.S. Army Air Defense Artillery Center
USACE	U.S. Army Corps of Engineers
USACERL	U.S. Army Construction Engineering Research Laboratory
USACHPPM	U.S. Army Center for Health Promotion and Preventive Medicine
USAEC	U.S. Army Environmental Center
USAMEDDAC	U.S. Army Medical Department Activity
USARC	U.S. Army Reserve Command
USFWS	United States Fish and Wildlife Service
UST	Underground Storage Tank
VOC	Volatile Organic Compound
WBAMC	William Beaumont Army Medical Center
WTP	Water Treatment Plant
WWTP	Wastewater Treatment Plant

APPENDIX B

SPECIFIC FACILITIES ASSESSED AND RESULTANT FINDINGS

The table contained in this appendix lists the facilities assessed by the ECAS team and the resultant finding number(s). The IFS number was coded as INST or MULT where appropriate. Definitions of acronyms are found in Appendix A. If no finding number is specified, no problems were discovered at that facility.

MEDIA KEY:

A	Air Emissions
CR	Cultural Resources
HM	Hazardous Materials
HW	Hazardous Waste
O1	Other - Environmental Impacts (NEPA)
O2	Other - Environmental Noise
O3	Other - Installation Restoration Program (IRP)
O4	Other - Pollution Prevention
O5	Other - Program Management
PM	Pesticide Management
PO	Petroleum, Oils, and Lubricants (POL)
SO	Solid Waste
ST	Storage Tanks
T1	Toxics - Polychlorinated Biphenyls (PCBs)
T2	Toxics - Asbestos
T3	Toxics - Radon
T4	Toxics - Lead Based Paint (LBP)
WA	Wastewater
WQ	Water Quality

APPENDIX B - FACILITIES ASSESSED AND RESULTANT FINDINGS

FACILITY NO.	LOCATION	FINDING ID	MEDIA ASSESSED
00002	DPTMS	05-SN-01	O5, SO
00011	DCA		O4, SO
00014	PREVENTIVE MEDICINE		PM, WQ
00015	PUBLIC AFFAIRS OFFICE	02-DB-005	O2
00021	AAFES		HM
00058	PRINTING SHOP		SO
00199	AAFES		SO
00250	OFFICERS CLUB	SO-KB-03	SO
00315	CHURCH		SO
00118	PVNTMED SERVICE	WQ-RV-09	WQ
00515	INSTALLATION	A-SC-01	A
00515	DIRECTORATE OF ENVIRONMENT	A-SC-09	A
00515	DIRECTORATE OF ENVIRONMENT	WQ-KS-04	WQ
00515	DIRECTORATE OF ENVIRONMENT	O2-DB-004	O2
00515	DIRECTORATE OF ENVIRONMENT	T4-JH-01	T4
00515	DIRECTORATE OF ENVIRONMENT	T2-JH-01	T2
00515	DIRECTORATE OF ENVIRONMENT	T2-JH-02	T2
00515	DIRECTORATE OF ENVIRONMENT	A-SC-07	A
00515	DIRECTORATE OF ENVIRONMENT		HM, O4, PM, SO, T2, T4
00516	SAFETY OFFICE	HM-JH-07	HM
00624	DIRECTORATE OF ENVIRONMENT	O1-TS-03	O1
00624	DPWL-DOE	WA-KP-11	WA
00624	DIRECTORATE OF ENVIRONMENT	O1-TS-01	O1
00624	DIRECTORATE OF ENVIRONMENT	O1-TS-04	O1

APPENDIX B - FACILITIES ASSESSED AND RESULTANT FINDINGS

FACILITY NO.	LOCATION	FINDING ID	MEDIA ASSESSED
00624	DIRECTORATE OF ENVIRONMENT	SO-KB-02	SO
00624	DIRECTORATE OF ENVIRONMENT	NR-TS-02	NR
00624	DIRECTORATE OF ENVIRONMENT	NR-TS-03	NR
00624	DIRECTORATE OF ENVIRONMENT	NR-TS-01	NR
00624	DIRECTORATE OF ENVIRONMENT	01-TS-02	01
00624	DIRECTORATE OF ENVIRONMENT	01-TS-05	01
00624	DIRECTORATE OF ENVIRONMENT	01-TS-06	01
00624	DIRECTORATE OF ENVIRONMENT	CR-CM-01	CR
00624	DIRECTORATE OF ENVIRONMENT	CR-CM-02	CR
00624	DIRECTORATE OF ENVIRONMENT	03-JG-02	03
00624	DOE-SOLID WASTE MGMT PROGRAM	SO-KB-09	SO
00624	DIRECTORATE OF ENVIRONMENT	NR-TS-04	NR
00624	DIRECTORATE OF ENVIRONMENT	05-SN-03	05
00624	DIRECTORATE OF ENVIRONMENT	05-SN-04	05
00624	DIRECTORATE OF ENVIRONMENT	CR-CM-05	CR
00713	DCA-CHILD CARE		PM
00777	DPWL	05-SN-02	05, PM
00820	DCA	HW-MB-02	HM, HW, PO
00820	DCA, AUTO CRAFT SHOP	SO-MB-02	HM, HW, PO, SO
00820	AUTO CRAFT SHOP	WA-KP-06	HM, HW, PO, WA
00820	AUTO CRAFT SHOP	SO-KB-03	HM, HW, PO, SO
01002	MCGREGOR DINING FACILITY		PM
01005	MESS HALL		SO

APPENDIX B - FACILITIES ASSESSED AND RESULTANT FINDINGS

FACILITY NO.	LOCATION	FINDING ID	MEDIA ASSESSED
01006	MESS HALL		PM, SO
01031	MCGREGOR DINING FACILITY		PM
01050	11 TH BRIGADE		HM
01056	31 ST ADA BDE/31 ST CSH	SO-DI-01	HM, SO
01063	DPWL		ST
01073	DPWL ROADS/GROUNDS MAINTENANCE	PO-KP-06	HM, HW, PO
01075	DPWL ROADS/GROUNDS MAINTENANCE	PO-KP-05	HW, PO
01076	GAFADS		HW, PO
01104	RAYTHEON		HW, PO
01105	RAYTHEON		HW, PO
01109	INSTALLATION FOOD SERVICES		PM
01112	DPWL CENTRAL CHLORINE STORAGE	A-SC-03	A
01116	DPWL REFRIGERATION SHOP	A-SC-08	A, HM, HW, PO
01124	CARPENTER SHOP		SO
01134	DPWL GSA MOTORPOOL		HW, PO
01159	DPWL HEAT SHOP	A-SC-04	A
01235	DPWL ENTOMOLOGY SHOP	HW-MB-05	HW
01273	MCGREGOR DINING FACILITY		SO
01288	DPWL ELECTRIC SHOP		HM, HW, PO
01318	DPWL	WQ-KS-01	WQ
01326	DPWL-GSA MOTORPOOL	ST-BN-06	ST
01334	DPWL-GSA MOTORPOOL	SO-MB-01	HM, SO

APPENDIX B - FACILITIES ASSESSED AND RESULTANT FINDINGS

FACILITY NO.	LOCATION	FINDING ID	MEDIA ASSESSED
01334	DPWL-GSA MOTORPOOL	PO-KP-03	HM, PO
01336	RECYCLING CENTER	SO-KB-05	O4, SO
01378	DPWL-LOCOMOTIVE MAINT FACILITY	PO-KP-04	HM, HW, PO
01610	CLASS VI STORE		SO, ST
01611	VETERINARY MEDICINE FACILITY		HM, PM
01680	POPEYES RESTAURANT		SO
01717	COMMISSARY		PM, SO
01730	CHILD CARE CENTER		SO
01735	AAFES/PXTRA	HM-JH-05	HM, PM, SO
02021	DEPARTMENT OF CONTRACTING	O4-PA-01	O4
02021	DEPARTMENT OF CONTRACTING	CR-CM-03	CR
02021	DEPARTMENT OF CONTRACTING	PM-MLB-18	PM
02423	2/43 108 TH ADA	WA-KP-03	HM, WA
02449	MCGREGOR DINING FACILITY		PM
02464	11 TH ADA	ST-BN-02	ST
02475	MCGREGOR DINING FACILITY		SO
02496	TROOP MEDICAL CLINIC-XRAY AREA		HM
02496	OCCUPATIONAL HEALTH	PM-MLB-03	PM, WA
02515	DPWL		A, HM, HW, PO, SO, WA
02519	DPWL		A, HM, HW, PO, SO, WA
02527	PURCHASING		SO
02528	DPWL SUPPLY		HM

APPENDIX B - FACILITIES ASSESSED AND RESULTANT FINDINGS

FACILITY NO.	LOCATION	FINDING ID	MEDIA ASSESSED
02529	DPWL PAINT SHOP/BOOTH	PO-KP-01	A, HM, HW, PO, SO, WA
02588	DPWL COMBAT & HEAVY EQUIPMENT MAINT COMBAT ARTILLERY SHOP	PO-KP-02	A, HM, HW, PO, SO, WA
02592	DPWL-MECHANICAL BRANCH		A, HM, HW, PO, SO, WA
02602	MCGREGOR DINING FACILITY		PM
02680	11 TH ADA 268 TH SIGNAL	SO-DI-02	PO, SO, WA
02642	2 ND BATTALION 43 RD ADA		ST
02643	2/1 BATTALION 35 TH ADA 178 TH MAINTENANCE FACILITY		PO, WA
02656	108 TH ADA BRIGADE		ST
02661	31 ST BRIGADE		HM
02901	MCGREGOR DINING FACILITY		PM
02942	108 TH ADA 2/43 BATTALLION	ST-BN-03	HM, HW, PO, ST
02949	BOWLING CENTER		PM, SO
02954	DENTAL CLINIC #3		HM, WA
02962	35 TH BRIGADE 2-1 ADA BATTALION		PO, WA,
02970	35 TH BRIGADE 2-1 ADA BATTALION		ST
02971	35 TH BRIGADE 2-1 ADA BATTALION		ST
03007	GOLF COURSE PESTICIDE MIXING/STORAGE FACILITY	PM-MLB-04	PM
03007	GOLF COURSE PESTICIDE MIXING/STORAGE FACILITY	PM-MLB-05	PM

APPENDIX B - FACILITIES ASSESSED AND RESULTANT FINDINGS

FACILITY NO.	LOCATION	FINDING ID	MEDIA ASSESSED
03007	GOLF COURSE PESTICIDE MIXING/STORAGE FACILITY	PM-MLB-06	PM
03007	GOLF COURSE PESTICIDE MIXING/STORAGE FACILITY	PM-MLB-07	PM
05898	DPWL/POWER PLANT	HW-KM-05	HW
04674	MCGREGOR DINING FACILITY		PM, SO
05115	HAZMART CENTER		O4, SO
05898	DPWL/POWER PLANT	HW-KM-06	HW
06077	VETERINARY TREATMENT FACILITY		HM, SO, WA
06900	TESCO-BIGGS AAF-OTSA		HM
07113	BAMC-CHILD CARE		PM
07777	WBAMC/RADIOLOGY	HW-KM-01	HM, HW
07777	WBAMC/CLINICAL LAB	HW-KM-02	HM, HW
07777	WBAMC/PHARMACY	HW-KM-03	HM, HW
07777	WBAMC/RADIOLOGY-ER	SO-KM-01	HM, SO
07777	WBAMC	HM-JH-04	A, HM, PO, SO, ST
08276	MATES-DONA ANA RANGE CAMP		HW, O4, PO
08659	OTO GRABDE RANGE CAMP		ST
08688	ORO GRANDE RANGE CAMP		ST
08690	ORO GRANDE RANGE CAMP		ST
08691	LOCKHEED MARTIN MISSILE MAINTENANCE FACILITY	PO-KP-07	HW, O4, PO
08777	DPWL	CR-CM-04	CR
09482	1 ST BATTALION MAINT FACILITY		HW, O4, PO

APPENDIX B - FACILITIES ASSESSED AND RESULTANT FINDINGS

FACILITY NO.	LOCATION	FINDING ID	MEDIA ASSESSED
09500	RANGE CONTROL-MCGREGOR RANGE		O2
09501	1 ST CAS BATTALION	O2-DB-002	O2
09510	MCGREGOR DINING FACILITY		PM
09521	AR AMSA #12		HW, O4, PO
09522	MCGREGOR RANGE MOTORPOOL		ST
09585	1 ST BATTALION MAINTENANCE FACILITY		HW, O4, PO
11000	41 ST EOD	HW-MB-03	HW
11005	RAYTHEON MAINTENANCE FACILITY	WA-KP-04	WA
11018	DPWL POL TANK FARM	A-SC-10	A, ST
11024	BIGGS BULK POL	ST-BN-04	ST
11108	204 TH MILITARY BATTALION		A, HM, HW, PO, SO, WA
11108	DPWL	HW-MB-01	HW, PO
11108	DPWL AVIATION MAINTENANCE	WA-KP-01	WA
11108	DPWL AVIATION MAINTENANCE	WA-KP-02	WA
11108	DPWL-BIGGS ARMY AIRFIELD		HM
11108	C CO. 204 TH MI BN	WA-KP-05	WA
11126	DRMO		HM
11156	WBAMC/MATERIALS BRANCH	HW-KM-04	HW
11189	AUTO CRAFT SHOP-BIGGS		HW, PO
11210	AVIATION DIVISION	O2-DB-003	O2
11211	BIGGS AAF-FIRE STATION #4		HM, PM
11236	PHOTO SHOP-BIGGS		HW, PO

APPENDIX B - FACILITIES ASSESSED AND RESULTANT FINDINGS

FACILITY NO.	LOCATION	FINDING ID	MEDIA ASSESSED
11304	TESCO		HM, HW, PO
11602	JTF-6		HM, HW, PO
11614	DRMO		HW, HM, PO, SO
11631	EL PASO FEDERAL CORRECTIONAL INSTITUTION	PM-MLB-09	PM
11631	EL PASO FEDERAL CORRECTIONAL INSTITUTION	PM-MLB-10	PM
11631	EL PASO FEDERAL CORRECTIONAL INSTITUTION	PM-MLB-11	PM
60-36	ENTOMOLOGY EQUIPMENT YARD 9B	PM-MLB-13	PM
60-36	ENTOMOLOGY EQUIPMENT YARD 9B	PM-MLB-16	PM
60-76	ENTOMOLOGY EQUIPMENT YARD	PM-MLB-12	PM
60-76	ENTOMOLOGY EQUIPMENT YARD 9B	PM-MLB-14	PM
60-76	ENTOMOLOGY EQUIPMENT YARD 9B	PM-MLB-15	PM
60-76	ENTOMOLOGY EQUIPMENT YARD 9B	PM-MLB-17	PM
INST	INSTALLATION	PO-MB-01	PO
INST	INSTALLATION	PM-MLB-01	PM
INST	DPWL	WQ-KS-05	WQ
INST	DPWL	WQ-KS-07	WQ
INST	IRP SITES		O3
INST	INSTALLATION WIDE	PM-MLB-02	PM
LAGOON	MCGREGOR RANGE BASE CAMP	WA-KP-08	WA
LAGOON	ORA GRANDE RANGE	WA-KP-10	WA
LAGOON	MCGREGOR RANNGE BASE CAMP	WA-KP-09	WA
LAGOONS	SEWAGE LAGOONS	WA-KP-07	WA

APPENDIX B - FACILITIES ASSESSED AND RESULTANT FINDINGS

FACILITY NO.	LOCATION	FINDING ID	MEDIA ASSESSED
LANDFILL	DIRECTORATE OF ENVIRONMENT	SO-KB-01	SO
LANDFILL	DPWL	SO-KB-06	SO
LANDFILL	DIRECTORATE OF ENVIRONMENT	SO-KB-07	SO
MULT	DPWL	SO-KB-04	SO
MULT	DPWL-POL TANK FARM	ST-SC-01	ST
MULT	DIRECTORATE OF ENVIRONMENT	WQ-KS-02	WQ
MULT	ORO GRANDE AND DONA ANA RANGES	A-SC-02	A
MULT	DIRECTORATE OF ENVIRONMENT	O3-JG-01	O3
MULT	DSERTS-DIRECTORATE OF ENVIRONMENT		O3
MULT	DPWL	SO-KB-03	SO
MULT	AAFES FOOD SERVICE FACILITIES	PM-MLB-08	PM
MULT	DPWL	HM-JH-01	HM
MULT	INSTALLATION SAFETY OFFICE	HM-JH-02	HM
MULT	DPWL	HM-JH-03	HM
MULT	AAFES	HM-JH-06	HM
OPEN DETONATION	41 ST EOD		HW

APPENDIX C - FINDINGS BY FACILITY TABLE

FACILITY NO.	LOCATION	QUESTION NO.	FINDING ID	CLASS	PAGE NO.
00002	DPTMS	05-008-003-A	05-SN-01	PO	3-79
00015	PUBLIC AFFAIRS OFFICE		02-DB-005	03	3-67
00118	PVNTMED SERVICE	WQ-015-002-TX	WQ-RV-09	02	3-168
00515	INSTALLATION	A-001-001	A-SC-01	01	3-4
00515	DIRECTORATE OF ENVIRONMENT	A-090-006	A-SC-09	01	3-6
00515	DIRECTORATE OF ENVIRONMENT	WQ-030-001-TX	WQ-KS-04	01	3-167
00515	DIRECTORATE OF ENVIRONMENT	02-001-003-A	02-DB-004	03	3-64
00515	DIRECTORATE OF ENVIRONMENT	T4-001-003-A	T4-JH-01	03	3-146
00515	DIRECTORATE OF ENVIRONMENT	T2-001-003-A	T2-JH-01	03	3-140
00515	DIRECTORATE OF ENVIRONMENT	T2-001-004-A	T2-JH-02	03	3-142
00515	DIRECTORATE OF ENVIRONMENT	A-001-002-A	A-SC-07	PO	3-12
00516	SAFETY OFFICE	HM-005-001-TX	HM-JH-07	H/S	3-32
00624	DIRECTORATE OF ENVIRONMENT	01-005-001	01-TS-03	01	3-56
00624	DPWL-DOE	WA-010-003	WA-KP-11	02	3-159
00624	DIRECTORATE OF ENVIRONMENT	01-005-012-A	01-TS-01	02	3-59
00624	DIRECTORATE OF ENVIRONMENT	01-005-003	01-TS-04	02	3-58
00624	DIRECTORATE OF ENVIRONMENT	SO-001-003-A	SO-KB-02	03	3-121
00624	DIRECTORATE OF ENVIRONMENT	NR-001-003-A	NR-TS-02	03	3-50
00624	DIRECTORATE OF ENVIRONMENT	NR-020-002-A	NR-TS-03	03	3-53
00624	DIRECTORATE OF ENVIRONMENT	NR-001-012-A	NR-TS-01	03	3-52

APPENDIX C - FINDINGS BY FACILITY TABLE

FACILITY NO.	LOCATION	QUESTION NO.	FINDING ID	CLASS	PAGE NO.
00624	DIRECTORATE OF ENVIRONMENT	01-001-002-A	01-TS-02	03	3-60
00624	DIRECTORATE OF ENVIRONMENT	01-005-016-A	01-TS-05	03	3-62
00624	DIRECTORATE OF ENVIRONMENT	01-005-008-A	01-TS-06	03	3-61
00624	DIRECTORATE OF ENVIRONMENT	C-020-001	CR-CM-01	03	3-20
00624	DIRECTORATE OF ENVIRONMENT	C-002-001-A	CR-CM-02	03	3-19
00624	DIRECTORATE OF ENVIRONMENT	03-001-002-A	03-JG-02	PO	3-73
00624	DOE-SOLID WASTE MGMT PROGRAM	SO-001-002-A	SO-KB-09	PO	3-126
00624	DIRECTORATE OF ENVIRONMENT	NR-001-007-A	NR-TS-04	PO	3-54
00624	DIRECTORATE OF ENVIRONMENT	05-008-007-A	05-SN-03	PO	3-80
00624	DIRECTORATE OF ENVIRONMENT	05-015-007-A	05-SN-04	PO	3-81
00624	DIRECTORATE OF ENVIRONMENT	C-001-002-A	CR-CM-05	PO	3-21
00777	DPWL	05-008-002-A	05-SN-02	03	3-78
00820	DCA	HW-010-001	HW-MB-02	01	3-39
00820	DCA, AUTO CRAFT SHOP	SO-003-001-TX	SO-MB-02	01	3-115
00820	AUTO CRAFT SHOP	WA-010-001	WA-KP-06	01	3-156
01056	31 ST ADA BDE/31 ST CSH	SO-003-001-TX	SO-DI-01	01	3-112
01073	DPWL ROADS/GROUNDS MAINTENANCE	PO-020-002	PO-KP-06	01	3-103
01075	DPWL ROADS/GROUNDS MAINTENANCE	PO-020-001	PO-KP-05	03	3-109
01112	DPWL CENTRAL CHLORINE STORAGE	A-001-004	A-SC-03	02	3-9
01116	DPWL REFRIGERATION SHOP	A-001-002-A	A-SC-08	PO	3-13
01159	DPWL HEAT SHOP	A-000-500-4T	A-SC-04	01	3-3

APPENDIX C - FINDINGS BY FACILITY TABLE

FACILITY NO.	LOCATION	QUESTION NO.	FINDING ID	CLASS	PAGE NO.
01235	DPWL ENTOMOLOGY SHOP	HW-010-001	HW-MB-05	01	3-42
01318	DPWL	WQ-010-002-TX	WQ-KS-01	01	3-164
01326	DPWL-GSA MOTORPOOL	ST-060-001	ST-BN-06	01	3-130
01334	DPWL-GSA MOTORPOOL	SO-003-001-TX	SO-MB-01	01	3-114
01334	DPWL-GSA MOTORPOOL	PO-020-001	PO-KP-03	03	3-107
01378	DPWL-LOCOMOTIVE MAINT FAC	PO-020-001	PO-KP-04	03	3-108
01735	AAFES	HM-002-001	HM-JH-05	H/S	3-28
02021	DEPARTMENT OF CONTRACTING	C-005-002	CR-CM-03	01	3-15
02021	DEPARTMENT OF CONTRACTING	PM-001-007-A	PM-MLB-18	03	3-87
02423	2/43 108 TH ADA	WA-010-001	WA-KP-03	01	3-153
02464	11 TH ADA	ST-005-001	ST-BN-02	03	3-134
02496	OCCUPATIONAL HEALTH	PM-002-001	PM-MLB-03	PO	3-100
02529	DPWL PAINT BOOTH	PO-020-001	PO-KP-01	03	3-105
02588	DPWL COMBAT AND HEAVY EQUIPMENT MAINTENANCE	PO-020-001	PO-KP-02	03	3-106
02680	11 TH ADA 268 TH SIGNAL	SO-003-001-TX	SO-DI-02	01	3-113
02942	108 TH ADA 2/43 BATTALLION	ST-005-001	ST-BN-03	03	3-137
03007	GOLF COURSE PESTICIDE MIXING/STORAGE FACILITY	PM-045-007-A	PM-MLB-04	03	3-96
03007	GOLF COURSE PESTICIDE MIXING/STORAGE FACILITY	PM-045-007-A	PM-MLB-06	03	3-97
03007	GOLF COURSE PESTICIDE MIXING/STORAGE FACILITY	PM-010-002-TX	PM-MLB-05	01	3-83
05898	DPWL/POWER PLANT	HW-010-001	HW-KM-05	01	3-44

APPENDIX C - FINDINGS BY FACILITY TABLE

FACILITY NO.	LOCATION	QUESTION NO.	FINDING ID	CLASS	PAGE NO.
05898	DPWL/POWER PLANT	HW-002-001	HW-KM-06	01	3-37
060-76	ENTOMOLOGY EQUIPMENT YARD	PM-045-002	PM-MLB-12	03	3-93
07777	WBAMC/RADIOLOGY	HW-055-005	HW-KM-01	01	3-45
07777	WBAMC/CLINICAL LAB	HW-070-005	HW-KM-02	01	3-47
07777	WBAMC/PHARMACY	HW-002-001	HW-KM-03	01	3-35
07777	WBAMC/RADIOLOGY-ER	SO-002-001-A	SO-KM-01	03	3-122
07777	WBAMC	HM-002-001	HM-JH-04	H/S	3-26
08691	LOCKHEED MARTIN MISSILE MAINTENANCE FACILITY	PO-020-001	PO-KP-07	03	3-110
08777	DPWL	C-005-003	CR-CM-04	01	3-17
09501	1 ST CAS BATTALION	O2-001-007-A	O2-DB-002	PO	3-70
11000	41 ST EOD	HW-105-001	HW-MB-03	01	3-48
11005	RAYTHEON MAINTENANCE FACILITY	WA-010-001	WA-KP-04	01	3-154
11018	DPWL POL TANK FARM	A-005-004-TX	A-SC-10	03	3-11
11024	BIGGS BULK POL	ST-005-001	ST-BN-04	03	3-136
11108	DPWL	HW-010-001	HW-MB-01	01	3-38
11108	DPWL AVIATION MAINTENANCE	WA-003-001	WA-KP-01	01	3-148
11108	DPWL AVIATION MAINTENANCE	WA-010-001	WA-KP-02	01	3-152
11108	C CO. 204 TH MI BN	WA-010-001	WA-KP-05	01	3-155
11156	WBAMC/MATERIALS BRANCH	HW-010-001	HW-KM-04	01	3-43
11210	AVIATION DIVISION	O2-001-007-A	O2-DB-003	03	3-66

APPENDIX C - FINDINGS BY FACILITY TABLE

FACILITY NO.	LOCATION	QUESTION NO.	FINDING ID	CLASS	PAGE NO.
11631	EL PASO FEDERAL CORRECTIONAL INSTITUTION	PM-001-007-A	PM-MLB-09	03	3-86
11631	EL PASO FEDERAL CORRECTIONAL INSTITUTION	PM-040-001-A	PM-MLB-10	03	3-90
11631	EL PASO FEDERAL CORRECTIONAL INSTITUTION	PM-045-002	PM-MLB-11	03	3-92
60-36	ENTOMOLOGY EQUIPMENT YARD 9B	PM-045-002	PM-MLB-13	03	3-94
60-36	ENTOMOLOGY EQUIPMENT YARD 9B	PM-045-005-A	PM-MLB-16	H/S	3-99
60-76	ENTOMOLOGY EQUIPMENT YARD 9B	PM-045-020-A	PM-MLB-14	03	3-98
60-76	ENTOMOLOGY EQUIPMENT YARD 9B	PM-015-001-A	PM-MLB-15	03	3-89
60-76	ENTOMOLOGY EQUIPMENT YARD 9B	PM-045-005-A	PM-MLB-17	03	3-95
INST	INSTALLATION	PO-065-006	PO-MB-01	01	3-104
INST	INSTALLATION	PM-001-003-A	PM-MLB-01	03	3-84
INST	INSTALLATION	O4-001-015-A	O4-PA-02	03	3-75
INST	DCA/RECYCLING CENTER	SO-025-001-A	SO-KB-05	03	3-124
INST	DEPARTMENT OF CONTRACTING	O4-005-001-A	O4-PA-02	03	3-76
INST	DIRECTORATE OF ENVIRONMENT	SO-001-002-A	SO-KB-08	03	3-120
INST	DPWL	WQ-001-005-A	WQ-KS-05	03	3-170
INST	DPWL	WQ-002-001-A	WQ-KS-07	03	3-172
INST	INSTALLATION WIDE	ST-090-002	ST-BN-05	01	3-132
INST	INSTALLATION WIDE	ST-025-001	ST-BN-01	02	3-133
INST	INSTALLATION WIDE	HW-010-001	HW-MB-04	01	3-40
INST	INSTALLATION WIDE	PM-005-001-A	PM-MLB-02	PO	3-101

APPENDIX C -- FINDINGS BY FACILITY TABLE

FACILITY NO.	LOCATION	QUESTION NO.	FINDING ID	CLASS	PAGE NO.
LAGOON	MCGREGOR RANGE BASE CAMP	WA-010-001	WA-KP-08	01	3-157
LAGOON	ORA GRANDE RANGE	WA-010-001	WA-KP-10	01	3-158
LAGOON	MCGREGOR RANNGE BASE CAMP	WA-021-002-NM	WA-KP-09	03	3-160
LAGOONS	SEWAGE LAGOONS	WA-003-001-NM	WA-KP-07	01	3-150
LANDFILL	DIRECTORATE OF ENVIRONMENT	SO-075-001-TX	SO-KB-01	01	3-118
LANDFILL	DPWL	SO-035-020	SO-KB-06	01	3-117
LANDFILL	DIRECTORATE OF ENVIRONMENT	SO-140-001-TX	SO-KB-07	01	3-119
MULT	DPWL	SO-010-002-TX	SO-KB-04	01	3-116
MULT	DPWL-POL TANK FARM	ST-010-001	ST-SC-01	01	3-128
MULT	DIRECTORATE OF ENVIRONMENT	WQ-003-001	WQ-KS-02	01	3-162
MULT	ORO GRANDE AND DONA ANA RANGES	A-001-004	A-SC-02	02	3-7
MULT	DIRECTORATE OF ENVIRONMENT	O3-001-006	O3-JG-01	03	3-72
MULT	DPWL	SO-010-001-A	SO-KB-03	03	3-123
MULT	AAFES FOOD SERVICE FACILITIES	PM-001-007-A	PM-MLB-08	03	3-85
MULT	DPWL	HM-002-001	HM-JH-01	H/S	3-23
MULT	INSTALLATION SAFETY OFFICE	HM-002-001	HM-JH-02	H/S	3-25
MULT	DPWL	HM-045-001	HM-JH-03	H/S	3-33
MULT	AAFES	HM-002-001	HM-JH-06	H/S	3-30

APPENDIX D

DRAFT INSTALLATION CORRECTIVE ACTION PLAN (ICAP)

Fort Bliss and TRADOC must now complete the Installation Corrective Action Plan (ICAP), a tracking system and funding strategy to address findings contained in this ECAR. The purpose of the ICAP is to serve as a planning document for Fort Bliss and TRADOC to use in tracking funding and execution of the selected corrective actions. The ICAP is intended to be a matrixed format listing findings, corrective actions, schedules and required resources for correcting the deficiencies.

The ICAP framework is provided on disk and in hard copy to Fort Bliss and TRADOC for further development. Using the ECAS software, Fort Bliss can generate an installation specific database to track corrective actions to the findings produced in this ECAR.

Typically, TRADOC will request the completed ICAP within 6 weeks of receipt of this ECAR and draft ICAP. Fort Bliss may be requested periodically by TRADOC to submit a report on the status of the ICAP.